Proposed Submission Gravesham Local Plan: Core Strategy

Version for Cabinet (as at 1 November 2012)

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1. Role of the Core Strategy

Purpose of this document

This document is the Council’s proposed submission Core Strategy published in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. It is accompanied by proposed changes to the Local Plan First Review (1994) Proposals Map. These are shown in Appendix 5. This will now be known as a Policies Map due to changes in the regulations. A final Policies Map will be published when the Core Strategy is adopted. This Core Strategy is accompanied by a Sustainability Appraisal/Strategic Environmental Assessment and a Habitats Regulation Assessment. These documents have been placed on deposit for public inspection and the Core Strategy is available for comment in advance of submission to the Secretary of State and public examination.

What is the Core Strategy?

The Local Plan is part of the Government’s planning system, introduced by the Planning and Compulsory Purchase Act 2004 (as amended). The Local Plan will consist of a collection of local development documents including Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs). In Gravesham Borough, the Local Plan will consist of the Core Strategy (this document) and a Site Allocations and Development Management DPD.

When adopted, the Local Plan will replace the existing adopted Gravesham Local Plan First Review 1994. It will be used, together with the Kent Minerals and Waste Local Plans, to help shape the future of the borough and to determine individual planning applications. This Core Strategy is the overarching document and the other DPDs and SPDs will sit below the Core Strategy and will need to be in conformity with it. The policies in this Core Strategy will replace a number of existing saved policies from the adopted Gravesham Local Plan First Review 1994 (see Appendix 2). Remaining saved policies from the adopted Local Plan will continue to operate until they are replaced or revoked.

This Core Strategy sets out the Council’s long term spatial vision for the Borough from 1 April 2011 to 31 March 2028. It outlines the strategic objectives for the Borough based on the characteristics of the area and the key issues to be addressed. It sets out a delivery strategy for achieving the objectives. It identifies the areas where major change is likely to take place and allocates key sites for development which are considered key to the achievement of this strategy. It also highlights areas where policies of restraint will apply and those places or characteristics that will be preserved and enhanced to ensure that the Borough’s unique sense of place and local distinctiveness remains the permanent foundation upon which our local community can grow and prosper.
This Core Strategy sets out as far as practicable when, where and by whom actions will be taken. This will involve the Council and other key interested parties in the public, private and voluntary sectors working in partnership to achieve common goals.

The approach set out in this Core Strategy has been developed against a backdrop of national economic uncertainty that has the potential to affect investment decisions and timing of delivery of development at the local level. Given there is no certainty about the economic upturn, either in terms of when it will come or how strong that recovery will be, it is vital that Gravesham plans for growth, but with flexibility, in order that the borough can benefit from the economic upturn, if and when it does come. Notwithstanding these concerns, Gravesham is in the fortunate position of having considerable amounts of infrastructure already in place and clarity about many of the developments, which have planning permission.

All the Local Plan documents that the Council is producing, and their production timeframe, are set out in the borough’s Local Development Scheme (LDS). The LDS and all the borough’s Local Plan documents can be viewed on the Council’s website below:

www.gravesham.gov.uk/ldf

**How does the Core Strategy link with other policies and strategies?**

The Core Strategy must be consistent with national planning policy, in particular the National Planning Policy Framework (NPPF) and the Planning Policy for Traveller Sites. It must also have regard to the sustainable community strategies produced by the Borough Council and Kent County Council. It should be noted that the statutory duty to prepare sustainable community strategies is likely to be abolished in the future.

The NPPF emphasises that the purpose of the planning system is to achieve sustainable development. It sets out the following three dimensions of sustainable development: economic, social and environmental. As a result of this, the Core Strategy includes a specific policy on sustainable development. Each policy section also includes details of national planning policy where it is relevant and how this has been taken into account in developing the policy. The NPPF does not change the statutory status of the development plan as the starting point for decision making. Proposed development that accords with an up to date Local Plan should be approved and proposed development that conflicts with it should be refused unless material considerations indicate otherwise.

The South East Plan is the Regional Spatial Strategy for the area. It is recognised that the government intends to abolish Regional Spatial Strategies. The South East Plan identifies the part of the Borough to the north of the A2 within the Kent Thames Gateway sub-region as a focus for growth and regeneration. It identifies Ebbsfleet as the location for a regional hub with a major business district in a mixed settlement with the opportunity to create a regional transport hub around the international rail station. The South East Plan strategy for Gravesham is based on making full use of previously developed land within the urban areas of Gravesend and Northfleet, locating major development to exploit the regional hub at Ebbsfleet and protecting the Green Belt and
other environmental assets. This reflects the long standing strategy for the area reflected in previous Structure Plans and national documentation on the Thames Gateway. The North Kent authorities within the Kent Thames Gateway sub-region (Gravesham, Dartford, Medway and Swale) retain the shared view that the same spatial strategy for the area should continue to be pursued.

The vision for the development of the Kent Thameside area (Gravesham and Dartford north of the A2) has been jointly evolved since the mid 1990’s on the basis of significant quantities of previously developed land and the opportunity provided by the International and Domestic Station on HS1 I the Ebbsfleet.

The Vision for Kent is the sustainable community strategy for Kent covering the period to 2012 – 2022. The Borough Council is one of the 14 local authorities which have signed up to this with the exception of proposals for a Lower Thames Crossing to the east of Gravesend set out in the ‘Growth without Gridlock’ supporting document. The Vision for Kent seeks:

• to grow the economy – for Kent to be ‘open for business’ with a growing and successful economy and jobs for all  
• to tackle disadvantage – for Kent to be a county of opportunity, where aspiration rather than dependency is supported and quality of life is high for everyone  
• to put citizens in control – for power and influence to be in the hands of local people so they are able to take responsibility for themselves, their families and their communities.

The Dartford and Gravesham Sustainable Community Strategy only covered the period to 2011 and the Strategic Partnership which approved it has now been dissolved. As a result, it is now of limited relevance to the Core Strategy. A Gravesend Locality Board has since been established with responsibility for the preparation of a new sustainable community strategy for Gravesham and to detail how the work undertaken by partners across the locality contributes to the delivery of the three key ambitions set out in the Vision for Kent. A Gravesham Community Strategy Statement of Intent for 2012-2022 has been produced to focus on those areas where partnership-working will aid the delivery of the ambitions for Kent, whilst ensuring the best possible outcome for the Gravesham community.

In the interim, a Corporate Business Plan for Gravesham has been approved covering the period 2011 – 2015. This has the following areas of focus:

• Keeping Gravesham safe  
• Working to maintain a clean and green environment  
• Working towards a healthy Gravesham  
• Engaging and empowering communities within the borough  
• Embracing and celebrating the diverse cultures within the borough  
• Managing housing developments in the borough to ensure they meet the needs of the community  
• Delivering a high quality council housing service alongside fully engaged tenants  
• Working with private housing providers in the delivery of quality housing  
• Meeting the housing needs of vulnerable people within Gravesham  
• Promoting healthy lifestyles amongst young people  
• Raising young people’s awareness of crime and anti-social behaviour issues  
• Engaging and empowering young people in the delivery of services
Driving the economic development of the borough
Ensuring a sustainable high quality built and green environment and safeguarding our cultural heritage
Working with partners to develop high quality transport infrastructure
Ensuring a strong customer focus and delivering quality frontline services
Managing the council’s business
Working to ensure council services provide value for money and are delivered efficiently

There is also a range of other strategies produced by the Borough Council and other key interested parties which have influenced and informed the policies set out in this document. These include both the adopted and emerging Core Strategies of neighbouring local authorities where the duty to co-operate introduced under the Localism Act 2011 applies. Please see the duty to co-operate statement for more information on this.

The Localism Act 2011 introduced a system of neighbourhood plans. These allow neighbourhood forums and parish councils to establish general planning policies for the development and use of land in a neighbourhood. Neighbourhood plans need to have regard to national planning policy, conform with the development plan for the area (i.e. the Local Plan and the Minerals and Waste Local Plans), and be compatible with EU obligations and human rights requirements. When adopted, they will form part of the development plan. No neighbourhood plans have yet been prepared in Gravesham.

How was this stage reached?

This document has been produced following a process that began in April 2005. It involved gathering information, analysing it and presenting the options for consultation with the public and other interested parties. The various stages of this process are set out in the Consultation Statement which accompanies this document. The key milestones are also shown in a diagram in Appendix 3.

The most recent public consultation took place between October and December 2011.¹ This was carried out for a number of reasons. The Government’s proposals to abolish the South East Plan meant that alternative growth scenarios for the Borough could be considered. It also took on board the availability of further evidence (including revised demographic projections), changes to national planning policy, the need to respond to comments made during an earlier consultation in 2010² and the need to consider a longer plan period. In particular, a more critical appraisal of site capacities combined with a consideration of sub market viability indicated that the levels of high density housing envisaged in the South East Plan could not be accommodated without departing from the South East Plan’s spatial strategy for the sub region. Key messages that have been taken on board from this process are that:-

¹ Gravesham Growth Scenarios and Core Strategy Consultation October 2011
• the original regeneration strategy involving a concentration of new development on previously developed land within the urban area of Gravesend and Northfleet should be adhered to;
• the original role of Ebbsfleet as a major mixed use development providing high quality jobs should be maintained;
• Gravesend Town Centre should be the main focus for new retail and other town centre types of development;
• priority should be given to growing the local economy and improving the prospects of the local workforce given existing poor levels of performance;
• the Borough’s housing needs should be met without encroaching onto the Green Belt; and
• areas of biodiversity and landscape value together with local green areas should be protected.

As a result of the above consultation and evidence gathered to ascertain the Borough’s objectively assessed development requirements, this Core Strategy sets out revised development requirements for the plan period (2011-2028). However in keeping with existing and past strategic approaches to the area, it maintains an emphasis on economic development, concentrating development on previously developed land in the Gravesend/Northfleet urban area and continuing to promote Ebbsfleet as a mixed use development. This is consistent with the South East Plan spatial strategy, the National Planning Policy Framework, the sub-regional approach to the Kent Thames Gateway and the plans of neighbouring local authorities. It is also consistent with the principle of Localism promoted by the national Government whereby top-down targets are abolished in favour of locally developed targets. It is on this basis that the vision, strategic objectives and policies set out in this document have been developed and tested through the sustainability appraisal.

Format of the Core Strategy

The first part of the Core Strategy assesses Gravesham’s characteristics, challenges and opportunities. This is followed by the spatial vision for the Borough to 2028 and the strategic objectives to achieve the vision. A key diagram is included after the strategic objectives to show the main elements of the strategy, including a number of opportunity areas. There is also a table which shows which Core Strategy policies will achieve each of the strategic objectives. This is followed by policies relating to the location and amount of development. A number of borough-wide policies are then included. All the policies will be subject to monitoring and review and there is a separate section on this. An infrastructure delivery schedule has been produced which lists all known infrastructure requirements for the key sites and overall development in the Borough as well as other known infrastructure coming forward in the Core Strategy period (see Appendix 1). As infrastructure requirements are likely to change over time, this schedule is a living document which will be periodically reviewed and updated. It will also be the starting point from which the Council identifies its priorities for the Community Infrastructure Levy. Whilst over time the Community Infrastructure Levy may provide significant contributions to infrastructure delivery, it is intended to fill the funding gaps that remain once existing sources of funding have been taken into account.
A glossary of technical terms has also been included and footnotes provided where further explanation or definition of terms and policy is required. Throughout this Core Strategy, employment floorspaces are net unless otherwise stated.

**Sustainability Appraisal**

The Core Strategy is subject to sustainability appraisal (SA). This involves identifying and evaluating a plan's impacts having regard to social, environmental and economic factors and helps to ensure that the plan accords with the principles of sustainable development. An objective of carrying out sustainability appraisal at each stage of the plan's development is also to ensure that the most reasonably sustainable option is selected. The SA is published separately as a supporting background document.

**Habitats Regulations Assessment**

Gravesham Borough contains sites of international importance for wildlife, i.e. a Special Protection Area, a Special Area of Conservation and a Ramsar site. As a result, the Core Strategy is also subject to a Habitats Regulations Assessment (HRA). This considers the impacts of the plan on the international sites and ensures that the plan does not have a negative impact on them. The HRA is published separately as a supporting background document.

**2. What are the Characteristics, Challenges and Opportunities in Gravesham Borough?**

**Purpose of this Section**

This section summarises Gravesham’s key characteristics and assesses the challenges and opportunities facing the area over the lifetime of this plan. It is key to understanding the policies set out later in the document because it describes the context and the issues that the Core Strategy needs to address. It also provides an overview of the direction that the Core Strategy and other components of the Local Plan will take in guiding the Council, the public, and other interested parties in shaping the Borough through to 2028 and beyond.

**Location**

Gravesham Borough is located on the south bank of the River Thames in the north of Kent approximately 32 kilometres (20 miles) east of London. It covers an area of 105 square kilometres (40 square miles) and is broadly triangular in shape. It stretches from the River Thames in the north to the crest of the North Downs in the south. The Borough is bounded by the local authorities of Dartford and Sevenoaks to the west,
Tonbridge and Malling to the south and Medway to the east. Thurrock lies to the north, on the opposite side of the River Thames.

Map 1: Gravesham Borough

The Borough is bisected from east to west by the A2/M2 trunk road and by the High Speed 1 railway route (Channel Tunnel Rail Link). The A2/M2 provides access to Greater London and the Channel Ports as well as the M25. The High Speed 1 route links Gravesend to London St Pancras via Ebbsfleet with journey times of approximately 25 minutes. High Speed 1 also links Ebbsfleet station, which lies just to the west of the Borough, to London St Pancras, Paris, Lille and Brussels. There are traditional rail
services running on the North Kent and Chatham main lines from Gravesend, Northfleet, Higham, Sole Street and Meopham stations to London and other areas of Kent. There is also a regular passenger ferry service across the River Thames from Gravesend to Tilbury.

The population of the Borough was 101,700 in 2011\(^3\), compared to around 95,700 when the 2001 census was taken. This is discussed in more detail in the Population section below. As the full 2011 census data is not yet available, the following sections use data from the 2001 census unless otherwise specified.

**Settlement pattern**

**Gravesend and Northfleet** comprise the main urban area. They lie to the north of the A2 alongside the River Thames. They are the principal settlements with the widest range of services and facilities and where about 80% of the population of the borough lives (about 75,000 residents).

Gravesend is an historic riverside town. It has a successful town centre with a good range of shops and multiple stores, including some small department stores. However, the number of vacant units has increased as a result of the recent economic downturn. Its main retail competition comes from the nearby regional shopping centre at Bluewater in Dartford and from other sub-regional centres such as Chatham and Maidstone. The town centre is a hub for public transport provision and is also where many of the Borough’s leisure, cultural and civic facilities are located.\(^4\)

The Gravesend and Northfleet urban area is the main location for housing and employment in the Borough. It contains a number of local centres and a range of other services. There are public transport links to Gravesend town centre. The employment on offer has traditionally been based on heavy manufacturing industry set alongside the River Thames where there are deep water wharves. Many of these industries have contracted over the past few decades leaving behind large tracts of under-used land set at a lower level than the surrounding urban area due to a history of chalk quarrying. These sites are potentially contaminated and may be subject to the risk of tidal flooding. Parts of the urban area suffer from poor air quality as a result of exhaust emissions from traffic and heavy industry. This has led to the declaration of a number of Air Quality Management Areas, e.g. one way system in Gravesend town centre, A2, some of the junctions on Old Road East/West.

Outside Gravesend and Northfleet, the Borough is predominately rural and is where about 20% of the population of the borough’s population lives (about 20,200 residents). 78% of the Borough is designated as part of the London Metropolitan Green Belt. 40% of the Green Belt is Ramsar or Kent Downs Area of Outstanding Natural Beauty. Most of the larger rural settlements are excluded from the Green Belt due to their built up nature although the Green Belt does wash over some of the smaller hamlets. The eastern Green Belt boundary in Gravesham is considered to be very important as the gap between Gravesend and the Medway Towns is now one of the few barriers preventing

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\(^3\) 2011 Census data  
\(^4\) Gravesend Wider Town Centre Baseline Report October 2011
the merging of settlements along the southern part of the Thames Estuary and the further eastward sprawl of London.

Whilst a significant amount of the Borough is rural, there are few particularly remote areas. Some of the larger rural settlements are comparatively self-sufficient in terms of local services as they have their own schools, GP surgeries and shops, but employment in the rural area is limited. However, residents of the Borough’s rural area are dependent on larger towns, such as Gravesend, the Medway towns and Sevenoaks, for access to key services. This means that connections with the urban areas are important.

To the south of the urban area off the A227, Istead Rise is the Borough’s second largest settlement (about 3,500 residents). Whilst it does not contain any significant employment uses, it has a range of facilities, such as a primary school, a GP surgery, a small supermarket and a post office. It also has a bus service to Gravesend and Sevenoaks.

Further south along the A227, there are 2 parts to Meopham: Hook Green (about 3,000 residents) and Meopham Green (about 1,200 residents). Hook Green has a number of shops, a post office and an employment site. There is also a railway station with regular services to the Medway Towns, Bromley and London Victoria. Meopham Green has a couple of employment sites. Both Hook Green and Meopham Green have a bus service to Gravesend and Sevenoaks and they share a primary school, a secondary school and a GP surgery.

Higham lies east of Gravesend off the A226. It has approximately 2,700 residents and a number of facilities including a primary school, a GP surgery, a post office and a number of small shops. It has a bus service to Gravesend and the Medway towns.

Culverstone Green lies south of Meopham off the A227. It has a population of about 1,200. It has a few facilities including a primary school, post office and small supermarket. It has a bus service to Gravesend and Sevenoaks.

Towards the south of the Borough lies the settlement of Vigo (about 2,200 residents). This has a primary school, a post office and some small shops as well as a regular bus service to Gravesend and Sevenoaks.

There are also several smaller settlements scattered throughout the Borough. These vary in population size, the number and range of services available (such as primary school, village shop) and access to public transport.

Population

The population of the Borough was 101,700 in 2011, an increase of around 6,000 compared to the 2001 census figure. Over the last 10 years, Gravesham Borough has

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5 Background information on the services and facilities available in the Borough’s settlements can be found in the Settlement Hierarchy Technical Paper December 2009
6 2011 Census data
been an area of out-migration, i.e. more people leave the Borough than come here to live. However, there are more births than deaths in the Borough which has led to the increase in the population during that time. The borough has a diverse population with significant BME and accession 8 countries.

By 2028, the population of the Borough is estimated to increase to around 104,900 residents, based on zero net migration. It is projected that there will be significantly more people aged over 55 and particularly those aged over 80, i.e. Graveshams has an ageing population. The resident labour supply is forecast to increase by 1,600 over this period. There is an increasing number of smaller households and by 2028 it is estimated that there will be over a 35% increase in the number of one person households.7

As a result of the above, over the Plan period there will be a need to provide:

- Additional new homes and jobs
- Dwellings suitable for one person households
- Dwellings suitable for an ageing population

**Housing**

There are around 41,500 dwellings in the Borough. In the last 5 years, an average of 269 dwellings per annum have been built in Graveshams.8 There is a mix of house types – detached, semi-detached, terraced and purpose built flats. The Strategic Housing Market Update 2012 indicates a particular need for 2 and 3 bedroom market housing and 1, 2 and 3 bedroom affordable housing. The Strategic Housing Market Assessment 2010 (SHMA) shows that the proportion of owned properties is similar to the South East average but the proportion of socially rented properties in Graveshams is higher and privately rented properties is lower.

Gravesham has lower average house prices for all house types than Kent and the South East. Despite this, the vast majority of properties in North Kent, including Gravesham, are unaffordable to most locally resident first time buyers. There are differences within the Borough whereby house prices in the rural area are significantly higher than in the urban area. The different housing sub markets affect the viability of development.9

In addition to the need to provide additional homes including those suitable for one person households and an ageing population identified under the Population section above, there will be a need to provide a mix of house types as well as affordable housing.

**Transport**

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7 Demographic and Labour Supply Assessment April 2012
8 Gravesham Annual Monitoring Reports
9 North Kent Strategic Housing Market Assessment 2009 and Affordable Housing Viability Study February 2010
As outlined earlier, Gravesham Borough has good road, rail and river transport links and Gravesend town centre is a hub for public transport provision in the Borough. These have recently improved. However, there are high levels of out-commuting to work, particularly to Dartford and Central London. In terms of mode, over half of working residents travel to work by car. This leads to congestion, particularly in parts of the urban area and along the A2. Gravesend town centre also experiences congestion as a result of retail and business activities. Levels of congestion will increase as a result of natural growth in traffic and new development. Traffic levels contribute to poor air quality in some areas.

The recent introduction of high speed rail services from Gravesend to London St Pancras and from Ebbsfleet to both London and the continent provides the opportunity to improve these transport hubs to provide high quality interchange facilities between different modes of transport.

The wharves on the River Thames are important for the transport of goods by water. A number of these are deep water wharves which are potentially important for the importation of minerals and handling other goods.

In view of these challenges and opportunities, there will be a need to ensure that:
- new development is mixed use and is located in areas with best access to services and facilities which minimise the need to travel, particularly by car;
- support is given to alternatives to car based transport such as improved bus, train, cycling, walking and river transport provision and improved transport hubs in Gravesend town centre and at Ebbsfleet;
- important deep water wharves are retained; and
- out-commuting is reduced.

**Economy and skills**

Gravesham has the smallest economy in Kent. It has undergone significant restructuring in recent years with a slight fall in employment. The Borough’s heavy manufacturing base, mainly located alongside the river, has been hit particularly hard and other sectors, especially those that create high wage, high value jobs, have not grown fast enough to fill the gap.

Just under half of the people living in Gravesham Borough are economically active. There are expected to be around 1,600 more economically active people in the Borough by the end of the plan period. Gravesham Borough has relatively high unemployment compared with Kent, the South East region and nationally. Unemployment above county and regional rates has prevailed in Gravesham over the past decade. This could be linked to the fact that on average Gravesham residents of working age have lower attainment and skills levels than other parts of the South East and nationally.

The insufficient local jobs and lack of jobs of a suitable quality to meet the needs of the Borough’s working residents lead to the high levels of out-commuting to work referred to above. Whilst there is also some in-commuting, overall there is a high net out-flow of around 33% of the workforce.
As well as contributing to the development of public transport hubs in Gravesend and Ebbsfleet, high speed rail services provide an opportunity to attract more businesses into the Borough due to greater accessibility and in turn, to create more higher quality jobs locally.

In view of the above, there is a need to improve the local economy by increasing the skills of the local workforce, providing a greater number, variety and quality of jobs and to maximise the economic regeneration potential offered by high speed rail services, which now link Ebbsfleet and Gravesend town centre with London and Europe, by ensuring a ready supply of good quality sites for economic development.

**Health, deprivation and crime**

There are wide variants in the level of overall deprivation in the Borough. Parts of Gravesend and Northfleet are amongst the most deprived in England. Conversely, much of the rural area is amongst the least deprived in England. This has an impact on life expectancy which for men living in the most deprived areas is nearly 9 years lower than for men living in the least deprived areas. The difference for women is over 4 years. To help overcome the deprivation issues experienced in Gravesham, there is a need to improve the local economy as well as to ensure that existing communities gain benefits as a result of the new developments in their area such as improved access to better facilities and improvements to the built environment.

Residents of Gravesham Borough experience some significant health issues. Adult obesity and the proportion of physically active children are significantly worse for residents in Gravesham than the English average. To enable residents to lead healthier lifestyles, there is a need to ensure that there are sufficient greenspaces and sports facilities to meet the needs of the existing and future population but also to ensure that shops, workplaces and other facilities can be accessed on foot and by bicycle.

The Borough’s ageing population will be associated with an increase in those who have difficulties completing household tasks and caring for themselves. There will also be an increase in those with a limiting long-term illness. This emphasises the need to provide homes suitable for an ageing population outlined above.

Gravesham experiences higher levels of recorded crimes than other parts of Kent. Levels of burglary, criminal damage, theft and violence are particularly significant. However, overall crime levels in the Borough have fallen substantially in recent years so that levels are now closer to the Kent average and are below the national average. As a result, new developments should be designed and laid out to minimise the risk of crime. In addition, to discourage anti-social behaviour, there is a need to provide access to safe and attractive indoor and outdoor recreational spaces.

**Heritage and the Built Environment**

The Borough has a rich historic built environment, much of which derives from its extensive maritime, military, industrial and transport history. This includes conservation areas in both the older parts of Gravesend and Northfleet and in a number of the rural
settlements. There are also a large number of listed buildings including several Grade 1 listed buildings such as Cobham Hall as well as a significant number of features of local historic and/or architectural value. Gravesham also has a number of Scheduled Monuments such as New Tavern Fort, known archaeological sites and historic landscapes, parks and gardens. The Borough’s unique character is part of its attractiveness for investment and therefore a positive approach to the conservation and enjoyment of the historic environment will be needed to ensure that the historic character and distinctiveness of the Borough is conserved and enhanced.

In addition to the more historic built up areas, Gravesend and Northfleet have post war and modern housing suburbs as well as industrial areas. Some of the rural settlements also contain modern housing developments.

Over the plan period the Borough will experience significant change with the creation of new neighbourhoods along the riverfront and at Ebbsfleet and the revitalisation of Gravesend town centre. Change elsewhere is likely to be small scale, involving redevelopment proposals and infilling. There is need to ensure that all new development is of a high quality. It should improve the existing built environment by protecting and enhancing local character and amenity and by creating new sustainable neighbourhoods with their own sense of place and distinctiveness which enhance their surroundings.

**Climate Change**

Climate change is expected to lead to hotter, drier summers and wetter, warmer winters with increased storm and flood events. Similar to the rest of Kent and the South East, the Borough experiences less rainfall/drier weather than other parts of the UK. On occasions, Gravesend has been recorded as the hottest place in the UK. The parts of the Borough alongside the River Thames are within areas where there is a high risk of flooding. There is also a risk of flooding along the Ebbsfleet stream and along the Borough’s dry river valleys as well as more general risks of surface water flooding during periods of heavy rainfall. Flooding and weather patterns in the Borough will be exacerbated by the effects of climate change. In recognition of this, the Thames Estuary 2100 (TE2100) Flood Risk Management Plan sets out the strategic direction for managing floods across the Thames Estuary, and contains recommendations on what actions the Environment Agency and others will need to take up to 2100. It is recognised that action is needed to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.

As a result of the above, there will be a need to ensure that development is located in the most accessible locations and facilities can be accessed by means other than car (see “Transport” section above). There will also be a need to ensure that development is designed and located to minimise the risk of flooding and flood defence infrastructure is protected. It will be important to encourage water conservation and other measures which reduce the Borough’s carbon footprint such as supporting low carbon and renewable energy generation.

**Natural Environment, Sport and Recreation**
Gravesham has significant natural resources. These include sites of international and national significance for wildlife such as the Thames Estuary and Marshes as well as local wildlife sites. It also includes the Kent Downs Area of Outstanding Natural Beauty which is a nationally important landscape as well as large areas of accessible countryside. The Borough also has a number of public greenspaces such as Riverside Leisure Area and Shorne Country Park, indoor sports facilities such as Cygnet Leisure Centre and Meopham Leisure Centre, and outdoor sports facilities such as outdoor tennis courts and bowling greens at Windmill Hill Gardens. There are some issues in terms of the quantity, quality and access to some greenspaces and indoor and outdoor sports facilities in the Borough.

As a result of the above, there is a need to conserve and enhance the Borough's high quality natural environment. There is also a need to protect, enhance and make adequate provision for greenspaces and indoor and outdoor sports facilities to meet the needs of the existing and future population of the Borough. In addition, it will be important to prevent adverse impacts on the birds and habitats of the internationally important wildlife sites, including disturbance to birds from uncontrolled recreational intrusion on the marshes.

3. The Spatial Vision and Strategic Objectives for Gravesham to 2028

**Spatial Vision**

By 2028, Gravesham will have reinvented and regenerated itself from an area with heavy riverside industry to one that offers a more diverse range of employment and housing which respects its unique built, historic and natural environment. The regeneration will have concentrated mixed use development on previously developed urban sites with access to a good range of services and facilities which will have minimised the need to travel, and the openness of the Green Belt will have been safeguarded and maintained.

Gravesham’s economy will have grown substantially and the skills of its workforce improved. The number, quality and diversity of jobs in the Borough will have increased which will have improved employment opportunities for residents and reduced the need to travel outside the Borough for employment. The majority of existing employment sites will have been safeguarded. At the same time, residents will be benefiting from new housing that meets their needs in terms of type, tenure and size.

The riverside along Northfleet and Gravesend will have been transformed with the creation of new thriving residential and mixed-use neighbourhoods with access to the riverfront. Both existing and new neighbourhoods will have benefited from an improved public transport network and from the provision of new and improved shopping and other facilities to provide for their needs. New employment sites will have been created, including major multimodal (i.e. accessible by river, rail and road) manufacturing and distribution industrial development. Important deep water wharves will have been retained.
A high quality new mixed use community will have been created at Ebbsfleet which makes the most of its proximity to the international railway station, to be further developed as a transport hub. It will be well connected by public transport and to existing neighbourhoods and facilities at Northfleet. Ebbsfleet will have provided for the shopping and service needs of its new community. It will have started to provide high quality B1 jobs and will continue to do so in the longer term, continuing the economic growth occurring in Gravesend and Northfleet.

Gravesend Town Centre will have built upon its strengths as a commercial centre and riverside heritage town to establish itself as a dynamic and desirable place to live and work and continue to be a focus for shopping, leisure, service provision, culture and tourism. Regeneration will have acted as a catalyst for the improvement of the town centre’s offer where the high quality design and public realm will enhance the distinctive character of the centre.

In the rest of Gravesend and Northfleet, smaller scale housing development and redevelopment will have taken place which reflect the character of the area. Neighbourhoods will have seen their local centres continue to provide for their local shopping needs and other facilities will have been retained and improved as needed.

In the rural area, the more built up rural settlements will have continued to experience small scale change through infill housing development. Village centres will have continued to provide for the local shopping needs of rural residents and other services will have been retained and potentially improved. Some small scale affordable housing will have been developed next to existing settlements to meet local needs. The character of the countryside and the diverse rural landscape will have been conserved and enhanced. Proposals that promote the appropriate expansion and diversification of the rural area economy will have been supported.

Regeneration and development will have conserved and enhanced the Borough’s rich historic built environment, landscape character and biodiversity as well as respected its distinctive local character. It will also have responded to the challenges of climate change, by minimising the risk of flooding, protecting flood defences, encouraging water conservation, improving energy efficiency, improving air quality and encouraging the use of low carbon and renewable energy. It will also have reduced the opportunities for crime and embraced the opportunities provided by new technology.

In Gravesham, opportunities to improve health and accessibility will have been seized by the provision of better facilities for recreation, sport, walking and cycling. A Green Infrastructure network will have been created to improve quality of life, provide benefits to wildlife, protect the landscape and improve access for leisure and sustainable travel purposes in particular within the Gravesend/Northfleet urban area, from the urban area to the rural area and along the River Thames.
**Strategic Objectives**

**Location and Amount of Development**

SO1 Concentrate development on underused, derelict and previously developed land in the urban area of Gravesend and Northfleet, in particular former industrial sites along the Thames Riverside and in Gravesend town centre, and at Ebbsfleet.

SO2 Provide a minimum of 4,600 new homes to meet the future needs of the Borough’s population, to include provision of affordable homes, homes for smaller households and older people, and sites for travellers.

SO3 Ensure that the right amount, size and type of employment sites are available in Gravesend and Northfleet to enable the delivery of a minimum of 4,600 new jobs over the plan period, to diversify and strengthen the local economy and reduce out commuting.

**Gravesend, Northfleet and Ebbsfleet**

SO4 Support current and create a number of new residential neighbourhoods, mixed use and employment areas along the Thames Riverside at Gravesend and Northfleet whilst retaining important deep water wharves.

SO5 Create a mixed use community at Ebbsfleet including a sub-regionally significant office based employment hub in the longer term to provide further jobs.

SO6 Enhance the role of Gravesend town centre as the main location for the Borough’s retail, leisure, cultural and small scale office facilities whilst preserving and enhancing its character as a riverside heritage town.

SO7 Enhance the Borough’s public transport network to serve existing and new neighbourhoods and communities in Gravesend, Northfleet and Ebbsfleet.

**Rural Area**

SO8 Safeguard and maintain the openness of the Green Belt.

SO9 Protect and enhance the diverse rural landscape including the Kent Downs Area of Outstanding Natural Beauty.

**Across the Borough**

SO10 Retain and where possible improve existing employment sites.

SO11 Seek to retain and improve the provision of existing services and facilities and ensure that sufficient facilities are provided to meet the needs arising from new development.
SO12 Safeguard and where possible enhance the retail character and function of the Borough’s town centre, local and village centres.

SO13 Protect and enhance the Borough’s heritage assets and historic environment.

SO14 Ensure that all new development makes a positive contribution to the local character and distinctiveness of the Borough, minimises the risk of crime, responds to climate change, and integrates into the existing built, historic and natural environment.

SO15 Improve opportunities for recreation, sport, walking and cycling.

SO16 Safeguard and enhance the biodiversity of the Borough.

SO17 Increase accessibility, minimise congestion and improve air quality through the improved provision of local public transport and the provision of local jobs and services.
Map 2: Key diagram
<table>
<thead>
<tr>
<th>Strategic Objective</th>
<th>Relevant Policies</th>
</tr>
</thead>
</table>
| **SO1**  
Concentrate development on underused, derelict and previously developed land in the urban area of Gravesend and Northfleet, in particular former industrial sites along the Thames Riverside in Gravesend town centre, and at Ebbsfleet. | CS01 - Sustainable Development  
CS02 - Scale and Distribution of Development  
CS03 - Northfleet Embankment and Swanscombe Peninsula East Opportunity Area  
CS04 - Gravesend Riverside East and North East Gravesend Opportunity Area  
CS05 - Gravesend Town Centre Opportunity Area  
CS06 - Ebbsfleet (Gravesham) Opportunity Area  
CS07 - Economy, Employment and Skills  
CS08 - Retail, Leisure and the Hierarchy of Centres  
CS09 - Culture and Tourism |
| **SO2**  
Provide a minimum of 4,600 new homes to meet the future needs of the Borough’s population, to include provision of affordable homes, homes for smaller households and older people, and sites for travellers. | CS01 - Sustainable Development  
CS02 - Scale and Distribution of Development  
CS03 - Northfleet Embankment and Swanscombe Peninsula East Opportunity Area  
CS04 - Gravesend Riverside East and North East Gravesend Opportunity Area  
CS05 - Gravesend Town Centre Opportunity Area  
CS06 - Ebbsfleet (Gravesham) Opportunity Area  
CS14 - Housing Type and Size  
CS16 - Affordable Housing  
CS17 - Provision of Traveller Sites. |
| **SO3**  
Ensure that the right amount, size and type of employment sites are available in Gravesend and Northfleet to enable the delivery of a minimum of 4,600 new jobs | CS01 - Sustainable Development  
CS02 - Scale and Distribution of Development  
CS03 - Northfleet Embankment and Swanscombe Peninsula East Opportunity Area |
<table>
<thead>
<tr>
<th>SO4</th>
<th>Create a number of new residential neighbourhoods and employment areas along the Thames Riverside at Gravesend and Northfleet whilst retaining important deep water wharves.</th>
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<tbody>
<tr>
<td></td>
<td>CS01 - Sustainable Development</td>
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<td></td>
<td>CS02 - Scale and Distribution of Development</td>
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<td>CS03 - Northfleet Embankment and Swanscombe Peninsula East Opportunity Area</td>
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<td>CS04 - Gravesend Riverside East and North East Gravesend Opportunity Area</td>
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<td>CS07 - Economy, Employment and Skills</td>
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<thead>
<tr>
<th>SO5</th>
<th>Create a mixed use community at Ebbsfleet including a sub-regionally significant office based employment hub in the longer term to provide further jobs.</th>
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<td>CS01 - Sustainable Development</td>
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<td>CS02 - Scale and Distribution of Development</td>
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<td></td>
<td>CS06 - Ebbsfleet (Gravesham) Opportunity Area</td>
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<td>CS07 - Economy, Employment and Skills</td>
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<tr>
<th>SO6</th>
<th>Enhance the role of Gravesend town centre as the main location for the Borough’s retail, leisure, cultural and small scale office facilities whilst preserving and enhancing its character as a riverside heritage town.</th>
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<tbody>
<tr>
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<td>CS01 - Sustainable Development</td>
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<td>CS02 - Scale and Distribution of Development</td>
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<td>CS05 - Gravesend Town Centre Opportunity Area</td>
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<td>CS07 – Economy, Employment and Skills</td>
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<td>CS08 - Retail, Leisure and the Hierarchy of Centres</td>
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<td>CS09 - Culture and Tourism</td>
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<td></td>
<td>CS19 - Development and Design Principles</td>
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<tr>
<td>SO7</td>
<td>Enhance the Borough’s public transport network to serve existing and new neighbourhoods and communities in Gravesend, Northfleet and Ebbsfleet.</td>
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<td></td>
<td>CS01 - Sustainable Development</td>
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<td>CS03 - Northfleet Embankment and Swanscombe Peninsula East Opportunity Area</td>
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<td>CS05 - Gravesend Town Centre Opportunity Area</td>
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<td>CS06 - Ebbsfleet (Gravesham) Opportunity Area</td>
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<td></td>
<td>CS11 – Transport</td>
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<td>CS19 – Development and Design Principles</td>
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<tr>
<th>SO8</th>
<th>Safeguard and maintain the openness of the Green Belt.</th>
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<tr>
<td></td>
<td>CS01 - Sustainable Development</td>
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<tr>
<td></td>
<td>CS02 - Scale and Distribution of Development</td>
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<td>CS07 – Economy, Employment and Skills</td>
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<td>CS09 - Culture and Tourism</td>
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<td></td>
<td>CS17 - Provision of Travellers</td>
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<td></td>
<td>CS18 - Climate Change</td>
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<tr>
<th>SO9</th>
<th>Protect and enhance the diverse rural landscape including the Kent Downs Area of Outstanding Natural Beauty.</th>
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<td>CS01 - Sustainable Development</td>
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<td>CS12 – Green Infrastructure</td>
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<td>CS19 – Development and Design Principles</td>
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<tr>
<th>SO10</th>
<th>Retain and where possible improve existing employment sites.</th>
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<tr>
<td></td>
<td>CS01 - Sustainable Development</td>
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<tr>
<td></td>
<td>CS02 - Scale and Distribution of Development</td>
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<td>CS05 - Gravesend Town Centre Opportunity Area</td>
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<td>CS07 - Economy, Employment and Skills.</td>
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<td>SO11</td>
<td>CS01 - Sustainable Development</td>
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<td>CS06 - Ebbsfleet (Gravesham) Opportunity Area</td>
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<td></td>
<td>CS10 - Physical and Social Infrastructure</td>
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<th>SO12</th>
<th>CS01 - Sustainable Development</th>
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<td>CS03 - Northfleet Embankment and Swanscombe Peninsula East Opportunity Area</td>
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<td></td>
<td>CS06 - Ebbsfleet (Gravesham) Opportunity Area</td>
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<td></td>
<td>CS08 - Retail, Leisure and the Hierarchy of Centres</td>
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<tr>
<th>SO13</th>
<th>CS01 - Sustainable Development</th>
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<td></td>
<td>CS02 - Scale and Distribution of Development</td>
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<td>CS09 – Culture and Tourism</td>
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<td>CS15 - Housing Density</td>
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<td>CS17 – Provision of Traveller Sites</td>
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<td></td>
<td>CS19 – Development and Design Principles</td>
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</table>
| SO14 | CS01 - Sustainable Development  
CS03 - Northfleet Embankment and Swanscombe Peninsula East Opportunity Area  
CS04 - Gravesend Riverside East and North East Gravesend Opportunity Area  
CS05 - Gravesend Town Centre Opportunity Area  
CS06 - Ebbsfleet (Gravesham) Opportunity Area  
CS12 – Green Infrastructure  
CS15 - Housing Density  
CS18 - Climate Change  
CS19 – Development and Design Principles  
CS20 - Heritage and the Historic Environment |
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<tr>
<td>Ensure that all new development makes a positive contribution to the local character and distinctiveness of the Borough, minimises the risk of crime, responds to climate change and integrates into the existing built, historic and natural environment.</td>
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</table>
| SO15 | CS01 - Sustainable Development  
CS03 - Northfleet Embankment and Swanscombe Peninsula East Opportunity Area  
CS04 - Gravesend Riverside East and North East Gravesend Opportunity Area  
CS05 - Gravesend Town Centre Opportunity Area  
CS06 - Ebbsfleet (Gravesham) Opportunity Area  
CS11 – Transport  
CS12 – Green Infrastructure  
CS13 - Green Space Sport and Recreation  
CS19 – Development and Design Principles |
| Improve opportunities for recreation, sport, walking and cycling. | |
| SO16 | CS01 - Sustainable Development  
CS03 - Northfleet Embankment and Swanscombe Peninsula East Opportunity Area |
<p>| Safeguard and enhance the biodiversity of the Borough. | |</p>
<table>
<thead>
<tr>
<th>Strategic Objective</th>
<th>Policies</th>
</tr>
</thead>
</table>
| SO17 Increase accessibility, minimise congestion and improve air quality through the improved provision of local public transport and the provision of local jobs and services. | CS01 - Sustainable Development  
CS02 - Scale and Distribution of Development  
CS03 - Northfleet Embankment and Swanscombe Peninsula East Opportunity Area  
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CS06 - Ebbsfleet (Gravesham) Opportunity Area  
CS07 - Economy, Employment and Skills.  
CS08 - Retail, Leisure and the Hierarchy of Centres  
CS09 - Culture and Tourism  
CS10 - Physical and Social Infrastructure  
CS11 – Transport  
CS13 - Green Space, Sport and Recreation  
CS19 – Development and Design Principles |

Table 1: Strategic Objectives and Policies
4. Location Policies

Sustainable Development

The National Planning Policy Framework (NPPF) explains that the purpose of the planning system is to contribute to the achievement of sustainable development. This has three dimensions: economic, social and environment. There is a need for the planning system to perform a number of roles under each of these as follows:

- an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;

- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being; and

- an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

For plan making, the presumption in favour of sustainable development means that:

- local planning authorities should positively seek opportunities to meet the development needs of their area;

- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
  - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF as a whole; or
  - specific policies in the NPPF indicate development should be restricted.

The NPPF advises that the specific policies in it that indicate development should be restricted include those relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, or an Area of Outstanding Natural Beauty; designated heritage assets; and locations at risk of flooding or coastal erosion.

The NPPF further states that policies in Local Plans should follow be based upon the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. It states that Local Plans should contain clear policies that will guide how the presumption should be applied locally.

The vision, objectives and policies in this Core Strategy seek to meet the needs of the Borough in terms of providing homes, jobs and supporting facilities in a sustainable way. They also seek to protect and enhance the built, historic and natural environment. This is fully in accordance with the three roles of the planning system in achieving sustainable development and the results of the Sustainability Appraisal of this Core Strategy reflect this. The following policy reflects the importance of taking into account the principles of sustainable development when taking decisions on future development in the Borough.
Policy CS01: Sustainable Development

Planning applications that accord with the policies in the development plan for Gravesham will be approved without delay, unless material considerations indicate otherwise.

When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework and in this Core Strategy. It will work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- Specific policies in that Framework indicate that development should be restricted.

Scale and Distribution of Development

In order to meet both current and future economic, social and environmental needs to achieve sustainable development in Gravesham, further development is needed within the Borough. Such development will meet the changing housing needs of the population, support and improve the local economy and develop services and facilities needed to support and benefit the existing local community.

Regeneration including new development can address the needs of communities experiencing deprivation. New development can help provide a range of new homes for local people, improve the environment and provide additional or improved facilities, and introduce new and potentially more affluent households to a deprived area.

The distribution of development set out in this Core Strategy is consistent with national planning policy and the current and previous regional and sub-regional policy approach to the wider Thames Gateway and Gravesham. It seeks to make full use of previously developed land within Gravesend and Northfleet, locate development to maximise the economic regeneration potential offered by Ebbsfleet and protect the Green Belt.

Development must be achieved in the most sustainable settlements where there is access to the greatest range of facilities and services and the most frequent public transport. The South East Plan established the Gravesend/Northfleet/Ebbsfleet area as

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10 As set out within the South East Plan and its supporting evidence base
being the most sustainable parts of the Borough through their identification within the Kent Thames Gateway Growth and Regeneration Area. These parts of the Borough comprise the main urban area. The rest of the Borough comprises the rural area. The boundaries of the urban and the rural areas are defined on the Policies Map (see Appendix 5 for change to the Policies Map).

An assessment has been carried out of the facilities and services available in the Borough’s settlements to identify which are more sustainable. The results are reflected in the settlement hierarchy below.

**Table xx: Settlement Hierarchy**

<table>
<thead>
<tr>
<th>Tier</th>
<th>Settlements</th>
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<tbody>
<tr>
<td>First Tier Settlements</td>
<td>Gravesend/Northfleet/Ebbsfleet, i.e. the urban area</td>
</tr>
<tr>
<td>Second Tier Settlements</td>
<td>Istead Rise, Hook Green Meopham, Higham</td>
</tr>
<tr>
<td>Third Tier Settlements</td>
<td>Culverstone Green, Meopham Green, Vigo</td>
</tr>
<tr>
<td>Fourth Tier Settlements</td>
<td>Cobham, Shorne, Sole Street</td>
</tr>
<tr>
<td>Other Settlements</td>
<td>Harvel, Lower Higham, Luddesdown, Lower Shorne, Shorne Ridgeway, Three Crutches</td>
</tr>
</tbody>
</table>

The extent of the Green Belt in Gravesham is defined on the Policies Map. Its local purpose is:

- to maintain the break in development between the eastern edge of Gravesend and the Medway Towns which is one of the few barriers preventing the further eastward sprawl of London and the merging of towns along the southern part of the Thames Estuary;
- to assist in safeguarding the countryside from encroachment by restricting the further expansion of the Borough’s rural settlements, to preserve their identity and to prevent further suburbanisation; and
- to assist in concentrating development on underused, derelict and previously developed land in the urban area of Gravesend and Northfleet.

The Borough has in the past been able to meet its development requirements without the loss of Green Belt. The challenge is to establish a distribution of development that can be satisfactorily accommodated within the most sustainable settlements without undermining the Green Belt. The sections below use the results of the technical studies to show how the Borough’s future development needs can be met by significant development in the urban area and infill development in the inset settlements, and avoid inappropriate development in the Green Belt as set out in national policy. This includes allowing small scale development within settlements which are inset from the Green Belt. Such settlements are defined on the Policies Map and have been excluded from the Green Belt because of their built up nature and suitability for small scale development.

**Housing**

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11 Settlement Hierarchy Technical Paper December 2009
This Core Strategy identifies how the Borough will meet its own objectively identified housing needs during the Plan period 2011-2028. The Council is planning on the basis of zero net migration. This means that there is a need for at least 4,600 new dwellings (271 dwellings per annum).12

The Council has carried out a Strategic Land Availability Assessment (SLAA). This shows that at least 4,600 new dwellings can be provided within the Gravesend/Northfleet/Ebbsfleet urban area and inset settlements. The main categories of supply are shown in Table X below.

<table>
<thead>
<tr>
<th>Category</th>
<th>Quantity</th>
</tr>
</thead>
<tbody>
<tr>
<td>A) Sites with outstanding permissions at 31 March 2011</td>
<td>2,999</td>
</tr>
<tr>
<td>including ones subject to a legal agreement being signed</td>
<td></td>
</tr>
<tr>
<td>B) Emerging Core Strategy Key sites without planning permission – adjusted capacity (to avoid double counting with approvals above)</td>
<td>772</td>
</tr>
<tr>
<td>C) Specific unallocated sites have the potential to make a contribution to housing delivery during the 5 year period (e.g. SLAA sites not covered by A) or B) above)</td>
<td>387</td>
</tr>
<tr>
<td>D) Small site windfalls (less than 5 dwellings)</td>
<td>330</td>
</tr>
<tr>
<td>E) Completions</td>
<td>177</td>
</tr>
<tr>
<td>Total</td>
<td>4,665</td>
</tr>
</tbody>
</table>

| Core Strategy Housing Requirement | 4,600    |

Source: SLAA 2012

The figures show a surplus of 65 dwellings in relation to the Borough’s housing provision. This is a comparatively robust supply because a high proportion (69% of the requirement) is made up of development already built or with planning permission. Assuming that these are built, then remaining supply (major site allocations and other non-major sites without planning permission and a small site windfall allowance) exceed the total needed to meet the Borough’s housing provision by 1.4%. It should be noted that the identification of a site in the SLAA does not represent it having any planning status unless it is a key site in this Core Strategy or it already has planning permission.

The trajectory, located in the five year supply statement, shows that the identified supply exceeds the requirement by the greatest extent over the first ten years. In the first five years of this period, the supply is comprised of identified deliverable and developable sites, the following six to ten year period is comprised of developable sites. During this first ten year period the Borough’s supply as identified exceeds the cumulative requirement by 229 units (or 10%). provision, this includes addressing the shortfall that arises in the first two years of the plan period (2011-13).

There are other sources of supply that the Council will take into account in monitoring and managing the housing supply over the Core Strategy period. Development from these sources will be monitored as part of the Authority Monitoring Report and added to the housing land supply. These are:

12 Gravesham Strategic Housing Market Assessment Update 2012
1. Small windfall sites in the first five years. In accordance with Government guidance, the supply does not include a figure for small sites in this period beyond outstanding planning permissions. However, past trends suggest that small windfall sites are a significant contributor to housing completions and the SLAA concludes that this will continue in the future. Actual completions from small site windfalls will count towards meeting the housing target when they occur.

2. Rural affordable housing developed under Policy CS16, which cannot be counted as contributing to the housing land supply until after completion.

3. Additional large windfall sites. The SLAA identifies large sites for development during the Core Strategy period. However, identifying all potential sites for development more than 10 years into the future is difficult, particularly redevelopment sites in the urban area. Therefore additional large windfall sites, not in the SLAA, can be expected. In the longer term, the SLAA will be reviewed to identify the emergence of potential new urban housing land.

The distribution of housing based on the identified supply is shown in Table X. The greatest capacity for new housing development is identified in the four opportunity areas within the urban area, then the rest of Gravesend and Northfleet with only limited opportunities in the rural area. This is consistent with the presumption in favour of sustainable development and a strategy that focuses development primarily in settlements with the widest range of facilities. Most of the housing total for the rural area consists of either completions or commitments in the form of planning permissions.

Existing housing will make up around 90% of the housing stock in 2028. As a result, it is important to safeguard and make the best use of the existing stock. Investment is needed to ensure that existing public and private housing meets improving standards. The Council has been undertaking a rolling programme of refurbishment and repairs of its housing stock. Where feasible, the Council also seeks to develop some small, under-used parcels of land that it owns, particularly to meet older persons and specialist housing needs. However, there are areas where a more proactive solution is needed and, for example, the redevelopment of Christianfields has resulted in the replacement of social housing in poor condition with new social and private sector housing. The Council will consider further estate renewal but the scale, location and timing of this will depend on factors such as the funding available, the condition of the units and the needs of the community.

Economy and Employment

The size and weakness of Gravesham economy is key to the rationale for maintaining the area’s supply of employment land. Research by the Institute for Policy Research (IPPR) in January 2012 listed the worst affected areas for the number of job seekers chasing every job vacancy and Gravesham was number 10 with 12 jobseekers for every vacancy. Another measure of the economy is job density which is the ratio of jobs to the population aged 16-64. The latest data from NOMIS is that the Borough’s job density is much lower than the SE average of 0.80. Gravesham’s job density is 0.51 compared to 0.89 for Dartford, 0.61 for Swale and 0.57 for Medway.

The Economy and Employment Space Study Addendum considers the employment space requirements up to 2031 based on a number of different scenarios, including zero
net migration. For this scenario, the study identifies a need for less employment space than at present as it was based on predictions of a falling working age population in the Borough. However, once migration is taken into account along with changes to retirement age over the plan period, a re-run of the forecasts suggests that the working age population will increase by 1,600 by 2028. The study was based upon a range of demographic, housing and economic scenarios that provided a demand-side perspective. It did not take into account other market or policy factors which may affect the delivery of employment space in the Borough such as: objectives to encourage diversified future employment growth; and potential outcomes that lower employment space delivery could have on rising local unemployment and increased out-commuting.

On the basis that Gravesham is seeking to substantially diversify and strengthen its economy and reduce out-commuting, it is planned to create a minimum of 4,600 new jobs over the Plan period. This is on the basis of providing at least one new job per new dwelling which has found favour throughout the development of the Core Strategy as a principle. It is also planned to maximise the employment potential of Ebbsfleet in the longer term for the provision of further jobs.

The SLAA shows that sufficient employment floorspace can be provided within the urban area at Gravesend/Northfleet to meet the identified need for at least 4,600 new jobs by 2028. It also shows that Ebbsfleet has the potential to deliver at least 1,416 new jobs in Gravesham in the latter part of the plan period, with scope for significantly more new jobs beyond the plan period. This reflects the long standing and continuing strategy for the area of creating a regional hub for the location of a major business district in a mixed settlement.

The distribution and amount of land to provide additional employment floorspace and jobs is shown in Table X. The greatest capacity for new employment development is identified in the four opportunity areas within the urban area, then the rest of Gravesend and Northfleet and with no new employment development identified in the rural settlements. This is consistent with the presumption in favour of sustainable development and focusing development primarily on settlements with the widest range of facilities.

Retail Development

The Retail Study Update 2012 identifies the future retail needs of the Borough as set out in Table X below. It does not take into account the commitments at Ebbsfleet, Northfleet Embankment West and Canal Basin because of the uncertainty of scale and timing of delivery. The Study Update concludes that future retail needs should be met primarily in Gravesend town centre, with a small allowance to meet localised needs elsewhere in the Borough.

<table>
<thead>
<tr>
<th>Table X - Summary of quantitative retail need</th>
<th>2028</th>
</tr>
</thead>
<tbody>
<tr>
<td>Comparison goods - net sq.m</td>
<td>16,660</td>
</tr>
<tr>
<td>Comparison goods - gross sq.m</td>
<td>22,210</td>
</tr>
</tbody>
</table>

13 contained in the Demographic and Labour Supply Forecasts July 2011
14 Demographic and Labour Supply Assessment April 2012
| Convenience goods - net sq.m | 1,620 |
| Convenienc goods – gross sq.m | 2,180 |
| Total – net sq.m | 18,280 |
| Total – gross sq.m | 24,390 |

Source: Retail and Commercial Leisure Background Paper

### Development Distribution

#### Residential

<table>
<thead>
<tr>
<th>Housing Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Northfleet Embankment and Swanscombe Peninsula East Opportunity Area</td>
</tr>
<tr>
<td>Gravesend Riverside East &amp; North East Gravesend Opportunity Area</td>
</tr>
<tr>
<td>Gravesend Town Centre Opportunity Area</td>
</tr>
<tr>
<td>Ebbsfleet (Gravesham) Opportunity Area</td>
</tr>
<tr>
<td>Rest of Borough</td>
</tr>
<tr>
<td>Borough wide projected completions of currently permitted schemes of 4 or less dwellings</td>
</tr>
<tr>
<td>Borough wide small site windfalls (assumption)</td>
</tr>
<tr>
<td><strong>Total</strong></td>
</tr>
</tbody>
</table>

#### Employment

<table>
<thead>
<tr>
<th>Employment Floorspace sq m (NIA unless otherwise stated)**</th>
<th>Anticipated Employment Generating Uses**</th>
<th>Job Numbers**</th>
</tr>
</thead>
<tbody>
<tr>
<td>Northfleet Embankment and Swanscombe Peninsula East Opportunity Area*</td>
<td>114,336 of which 113,511 is B Class floorspace</td>
<td>A1, A3, B1a, B1c, B2, B8,</td>
</tr>
<tr>
<td>Gravesend Riverside East &amp; North East Gravesend Opportunity Area</td>
<td>25,494 of which 20,244 is B Class floorspace</td>
<td>A1, A2, A3, B1a, B1c, B2, B8 D2</td>
</tr>
</tbody>
</table>
Gravesend Town Centre Opportunity Area | 20,821 of which 5,000 is B Class floorspace (as well as 42 room hotel) | A1, A2, A3, B1a, C3 | 1,271
Ebbsfleet (Gravesham) Opportunity Area | 19,810 of which 17,000 is B Class floorspace | A1, B1a | 1,564
Rest of Borough* | 4,669 of which 4,294 is B Class floorspace (as well as 60 room hotel) | A1, A3, B1a, B1c, C1 | 371
**Total** | 185,130 of which 160,049 is B Class floorspace (as well as two hotels with 102 room hotel) | 6,212 of which 4,791 are B Class jobs

*Excludes floorspace figure for LaFarge Bulk Aggregates Import Terminal, Northfleet and Sainsbury's Store, Wingfield Bank, Northfleet. But job figures are included.
** Based on Core Strategy Opportunity Area Policies, SLAA employment data includes completions for 2011-12 and additional sites.

<table>
<thead>
<tr>
<th></th>
<th><strong>2011-13</strong></th>
<th><strong>2013-18</strong></th>
<th><strong>2018-23</strong></th>
<th><strong>2023-28</strong></th>
<th><strong>Total 2011-2028</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Northfleet Embankment and Swanscombe Peninsula East Opportunity Area</td>
<td>-2</td>
<td>81</td>
<td>382</td>
<td>567</td>
<td>1028</td>
</tr>
<tr>
<td>Gravesend Riverside East &amp; North East Gravesend Opportunity Area</td>
<td>0</td>
<td>205</td>
<td>375</td>
<td>200</td>
<td>780</td>
</tr>
<tr>
<td>Gravesend Town Centre Opportunity Area</td>
<td>66</td>
<td>456</td>
<td>322</td>
<td>29</td>
<td>873</td>
</tr>
<tr>
<td>Ebbsfleet (Gravesham) Opportunity Area</td>
<td>105</td>
<td>250</td>
<td>250</td>
<td>67</td>
<td>672</td>
</tr>
<tr>
<td>Rest of Borough</td>
<td>207</td>
<td>502</td>
<td>88</td>
<td>53</td>
<td>850</td>
</tr>
<tr>
<td>Borough wide projected completions of currently permitted schemes of 4 or less dwellings</td>
<td>33</td>
<td>99</td>
<td>0</td>
<td>0</td>
<td>132</td>
</tr>
<tr>
<td>Borough wide small site windfalls (assumption)</td>
<td>0</td>
<td>0</td>
<td>165</td>
<td>165</td>
<td>330</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>409</strong></td>
<td><strong>1593</strong></td>
<td><strong>1582</strong></td>
<td><strong>1081</strong></td>
<td><strong>4665</strong></td>
</tr>
</tbody>
</table>

Table 4: Dwellings distribution
**Policy CS02: Scale and Distribution of Development**

The development strategy for the Borough is to retain the existing stock of housing and suitable employment land and to make provision for at least 4,600 new dwellings and 4,600 new jobs during the plan period.

Development will be distributed throughout the Borough as follows*:

- Approximately 3,387 new dwellings and 5,841 new jobs will be provided in the opportunity areas in the urban area. These comprise: Northfleet Embankment and Swanscombe Peninsula East; Gravesend Riverside East and North East Gravesend; Ebbsfleet (Gravesham) and Gravesend Town Centre;
- Approximately 877 new dwellings and 371 new jobs will be provided in the rest of the urban area including the provision of an enterprise centre comprising offices and light industrial units on greenfield land South of Coldharbour Road; and
- Approximately 71 new dwellings will be provided in the rural area

The strategy focuses development in the urban area as a sustainable location for development. This will be achieved by:

- Promoting regeneration by prioritising the redevelopment and recycling of underused, derelict and previously developed land in the urban area. This will be principally through redevelopment of former industrial sites in the opportunity areas of Northfleet Embankment and Swanscombe Peninsula East, and Gravesend Riverside East and North East Gravesend to create new residential neighbourhoods and employment areas
- The continued development of a new sustainable mixed use community in the Ebbsfleet (Gravesham) opportunity area, which will include the provision of high quality employment floorspace
- Revitalising the Gravesend town centre opportunity area as a focal point for retail, leisure, cultural and tourism facilities and small scale office provision to serve the needs of the Borough whilst preserving and enhancing its character as a riverside heritage town
- Bringing forward a range of suitable sites in other parts of the urban area for residential and employment development.

In the rural area, the extent of the Green Belt, as defined on the Policies Map, will be maintained and protected from inappropriate development. Small scale development will be allowed within those rural settlements which are inset from the Green Belt and defined on the Policies Map. Development which supports the maintenance and diversification of the rural economy will be supported provided it is compatible with policies for protecting the Green Belt.

*Figures exclude small site windfalls for dwellings which are assumed to total 330 new dwellings in years 2018-2028*
Policy delivery mechanisms

Green Belt
• Gravesham Local Plan Policy 1st Review Policy GB1 is being saved as this defines the extent of the Green Belt which is not being changed.
• In the Green Belt Boundary Review Technical Paper 2009, the Council highlighted some minor changes worthy of consideration. Therefore small scale adjustments to Green belt boundaries may be considered via a targeted Green Belt Boundary review which would be undertaken to inform the Site Allocations and Development Management Policies DPD. Such a review would be limited in scope.

Development quantities
• The delivery of homes and jobs will primarily be by the private sector. For homes, a proportion will be developed by Registered Providers and potentially the Council itself. The council will also facilitate delivery of homes working with its partner organisations and where appropriate will support other mechanisms, including custom-build homes.
• Additional developable sites for housing and employment (including mixed-use developments) will be allocated in Site Allocations & Development Management Policies DPD. This will include sites within the opportunity areas in addition to the key sites allocated within this Core Strategy.
• The Strategic Land Availability Assessment will set out the deliverable and developable supply of housing land to ensure a continuous supply of deliverable sites.
• The policy will be monitored and reviewed through annual Housing Information Audits (HIA) and Commercial Information Audits (CIA), Authority Monitoring Reports, regularly updated Strategic Land Availability Assessments and deliverable housing supply surveys.
Opportunity Areas in Gravesham

Four opportunity areas in the urban area are identified in this Core Strategy. The identification of these gives the Core Strategy resilience and flexibility whilst showing where most change within the Borough will occur over the plan period. Within the opportunity areas are a number of key sites which are strategic site allocations. The key sites have the capacity to deliver new housing, employment and retail development to meet most of the Borough’s needs over the plan period. Both the opportunity areas and the key sites are shown on the Policies Map. The opportunity areas are also shown on the Key Diagram.

Introduction

The concept of opportunity areas has been developed by the Council to establish a broad framework within which development can take place and an overall vision can be realised. The opportunity areas, together, form a significant regeneration area in the Thames Gateway, extending along the whole of the urban riverside and its hinterland and occupying almost a third of the built up area of Gravesham.

This Core Strategy aims to transform and revitalise a previously developed land, strengthen the vitality and vibrancy of Gravesend as the Borough's principal town centre and create a modern, integrated, accessible and sustainable community which meets the full range of people's needs and aspirations, both within the immediate area and within the borough as a whole.

Within this area opportunities have been recognised, not only for the development of nine key sites during the plan period, but also for the maintenance, improvement and development of adjoining sites as part of a comprehensive approach, which will benefit both existing and new communities. The concept of opportunity goes further, recognising the development potential of Swanscombe Peninsula and Ebbsfleet, which will carry the regeneration process beyond the plan period and beyond the boundaries of Gravesham as part of a longer term, sub-regional vision.

Whilst the opportunity areas have characteristics which are specific to them, they have a number of issues in common. The section below is included to avoid repetition in the opportunity area policies. It should be noted that other Core Strategy policies also apply. All policies in the Development Plan should be taken into account in the consideration of development proposals.

Common issues

The proposed developments on the key sites are of a scale that they will have a significant impact on their localities. They will need to be carefully planned and phased to ensure that they are well integrated with and maximise benefits for the existing communities as well as providing for the needs of new communities. In some cases, development will result in the provision of new services such as schools and open space which will benefit existing and new communities. In other cases, transport infrastructure will be required to provide links between new and existing communities, e.g. bus services, footpaths. Policies CS10, CS12 and CS13 on Physical and Social Infrastructure, Green Infrastructure and Green Space, Sport and Recreation will apply.
The opportunity areas all lie within areas where there is a potential risk of flooding which is a major constraint on the type and form of development that can be accommodated. Policy CS18 on Climate Change sets out the relevant requirements for developments in areas at risk of flooding and the requirements in relation to surface water run-off and Sustainable Drainage Systems.

On all the key sites, the scale of development will be such that developments should take the opportunity to deliver carbon reduction, renewable energy and water efficiency measures in accordance with Policy CS18 on Climate Change.

The opportunity areas all contain heritage interest including listed buildings, conservation areas, archaeological search areas and scheduled monuments, and therefore interpretation of heritage assets is likely to be a consideration of many of the key sites. The particular heritage features are referred to in the background text to the policies but not in the policies themselves as Policy CS20 on Heritage and the Historic Environment will apply.

Three of the opportunity areas are located alongside the River Thames and there are specific issues which apply to them. Within these areas, there will be a need to:

- Maintain, improve and replace tidal flood defences in line with the evolving Thames Estuary 2100 plan (see Policy CS18 on Climate Change);
- Facilitate the creation of a high quality, dedicated pedestrian and cycle link alongside the River Thames or, where this is not possible due to the nature of riverside activity, as close as possible to it (see Policy CS12 on Green Infrastructure and Policy CS11 on Transport); and
- Safeguard wharves, except where this would be detrimental to achieving the key regeneration objectives of the key sites (see Policy CS11 on Transport)

The key sites are accompanied by schematic plans which provide a visual indication of the key principles to be applied to each site.
**Northfleet Embankment and Swanscombe Peninsula East Opportunity Area**

Map 4: Northfleet and Swanscombe Peninsula East Opportunity Area
The Northfleet Embankment and Swanscombe Peninsula East Opportunity Area lies on the Thames waterfront and extends around 4 kilometres from the boundary with Dartford Borough in the west to the Gravesend Town Centre Opportunity Area in the east. Much of the area is characterised by its industrial past, with deep chalk workings that once supported the local cement industry creating abrupt changes in level and dividing the older settlements on higher ground from the river below. The riverside quarries once accommodated a variety of heavy industrial uses but these have largely disappeared, leaving an area that is environmentally degraded and with many vacant or under-used sites. There are clear opportunities in this location to make more efficient use of the land, facilitate river-related activity, accommodate new development and secure environmental improvement as part of the wider regeneration of the area. The accompanying diagram shows the main sub-areas comprising this Opportunity Area.

Most of this opportunity area (with the exception of sub-areas 1.6 and 1.9) is within the Northfleet Industrial Air Quality Management Area which was declared because of high levels of particulate matter, i.e. dust, arising from uncontrolled emissions from industrial processes. The closure of the Northfleet Cement works has removed a major source of dust, but current activities and the open nature of some of the area mean that it remains a potential issue. It will be important to take account of air quality in bringing forward any development of the area and a key objective will be to secure continued improvements to air quality.

Swanscombe Peninsula East Undeveloped Area (sub-area 1.1) is a large area of land that projects northwards into a bend of the River Thames on the boundary between the boroughs of Dartford and Gravesham. It is mainly low lying and comprises a mixture of residual marsh used for agriculture/grazing and raised ground. The development potential is likely to be constrained by:

- Access – the Gravesham side of the peninsula is only served by a single junction onto the A226 at Galley Hill Road, a private access road on its eastern periphery, and the unmade Lower Road private lane to the south;
- Ground conditions – the northern part of the peninsula has been raised using Cement Kiln Dust and the southern part in Gravesham is former marsh;
- Proximity to existing industrial uses – the eastern side of the peninsula in Gravesham is occupied by heavy and port related industries that may impede development nearby;
- Biodiversity – although not subject to any designation, the marshes and mudflats provide important habitats and the biodiversity interest would need to be taken into consideration;
- Utilities – the Gravesham part of the peninsula is crossed by high voltage power lines forming part of the National Grid;
- Navigation – the northern part of the peninsula is affected by navigational sight line, radar and telecommunication constraints; and
- Railways – the High Speed 1 (HS1) railway line effectively severs the southern part of the marsh before going into tunnel and passing under the River Thames.

The Council considers that there is development potential at Swanscombe Peninsula. However, the constraints and the absence of any definitive proposals showing how they could be overcome suggest that any development in this area is only likely to be
deliverable in the longer term. As a result, any development should come forward using a comprehensive masterplan approach that has regard to proposals for the Dartford part of the peninsula, development phasing and the possible need for a new highway link to relieve the existing A226 and improve accessibility to the peninsula. The presumption is that any development in this sub-area is most likely to comprise industrial/commercial uses together with greenspace to protect the biodiversity of the area. Residential development is not ruled out as part of a mixed-use site but would need to overcome the constraints and provide a sustainable form of development that integrates well with the adjoining urban areas.

Swanscombe Peninsula East Riverside Industrial Area (sub-area 1.2) comprises mainly industrial and port-related uses that sit behind the existing tidal flood defences. Access to this area is from the junction with the A226 at Galley Hill Road and a narrow privately maintained road. It is anticipated that this area will remain in active employment uses over the plan period. The expansion of industrial and port related employment in this area will be supported.

Grove Road and Lower Ebbsfleet Area (sub-area 1.3) consists of a number of separate sites that have regeneration potential. These may be realised during or beyond the plan period depending on the aspirations of the landowners and the viability of development. Viability is likely to be influenced by the relative success of the Ebbsfleet development to the south. The development potential of this area is likely to be further constrained by:

- **Ground conditions** – the area has been actively used for industrial purposes for over 200 years and is likely to be subject to contamination;
- **Heritage and archaeology** – the area around Robin’s Creek (outflow of the Ebbsfleet into the Thames) was the site of a medieval watermill later converted to grind cement in the 1790s, Portland cement was later invented here and Aspdin’s Kiln (Scheduled Monument) and other features of heritage interest are likely to remain; and
- **Existing uses** – development of sites on a piecemeal basis is likely to be constrained by the proximity of existing poor neighbours or the need to retain/decant existing uses (including the local football ground).

Part of this sub-area has the potential for residually-led regeneration to complement the proposal to extend the existing residential development in sub-area 1.4 (see below) and this is identified as a Key Site. Initial estimates suggest that this area could deliver up to 200 new homes. Such development would be expected to: preserve, enhance and interpret the local heritage assets; improve and enhance Robin’s Creek and the Ebbsfleet stream; improve the greening of this area; and reduce the heavy commercial traffic and parking on Grove Road.

The Council supports the creation of a new navigable harbour for recreational purposes at Robin’s Creek as this has the potential to create a high quality development, add value to other developments in the vicinity and contribute to the re-establishment of Northfleet as an historic riverside settlement. This would be subject to ensuring that the drainage functions of the Creek and its biodiversity interest are not adversely affected and that there is no potential conflict between recreational boats and commercial shipping on the river, and other proposals in the Opportunity Area.
**Old Northfleet Residential Extension (sub-area 1.4)** comprises an area of previously developed land extending northwards from The Hive local centre down College Road to the River Thames. A separate spur of land, divided from the main area by a cutting that carries the access road to the former cement works site from Thames Way (A226), extends northwards from the existing residential area down the former alignment of Lawn Road.

This area is identified as a **Key Site**. The Council’s approach to this area is that residential development will be supported as it forms a logical extension to the existing established community of Northfleet and will re-connect it with the River Thames. This will include and extension to the Hive local centre and facilities to support the development. There is a resolution to grant planning permission for such use.

**Northfleet Cement Works Regeneration Area (sub-area 1.5)** consists of the remainder of the former Lafarge cement works site and lies at a lower level than the adjoining residential community on the banks of the River Thames. Access to the site is primarily via a road tunnel from the A226 Thames Way that passes through Vineyard Pit. A rail connection to the North Kent Line has also been recently reinstated via Church Path Pit, a connected site to the south, which has the potential to be extended to sub-areas 1.7 (Kimberly Clark) and 1.8 (Northfleet Embankment East) in due course. There is also good deep water access via the existing Wharf 42.

This area is identified as a **Key Site**. There is a resolution to grant planning permission for up to 46,000 gross square metres employment floorspace for business, industrial and storage and distribution uses under use classes B1, B2 and B8. In conjunction with this, consent has also been given for the dismantling, relocation and reassembly of the Bevans War memorial and creation of open space, landscaping and ancillary works. The other Grade II listed building within the site is the Port of London Authority owned Northfleet Lower Lighthouse located at the eastern end of 42 Wharf. The lighthouse is expected to remain in its present position and retain its industrial setting.

A planning permission also exists for the use of part of the site as a Bulk Aggregates Import Terminal, whilst a major cement importing facility has been created through the conversion of the former cement works coal store. In the short term, much of the site will be used for the importation and onward transhipment of Crossrail spoil. In the longer term, it is anticipated that the employment development will come forward.

**Old Northfleet Residential Area (sub-area 1.6)** comprises a series of residential neighbourhoods and the local centres at The Hill and The Hive. The area around The Hill forms part of a conservation area. The area around The Hive was rebuilt during the 1960s, along with Huggins College and Wallis Park. As a result, the area lost much of its distinctive character as an historic riverside industrial town associated with the early development of the cement industry. The loss of residential and other development to the northern end of College Road, along with the impounding of Robin’s Creek in the 1980s by the creation of a new flood defence, effectively completed the severance of this community from the River Thames.

Although linked together by the line of the B2175 Northfleet High Street, the different parts of Old Northfleet are separated by deep chalk workings that make the area quite disjointed. Whilst there is a limited range of facilities here to serve the local community, it suffers from high levels of deprivation and would benefit from a co-ordinated approach.
to improvement. A recent award of Big Lottery Funding provides an opportunity to draw the community together and establish local priorities for investment.

The Council supports the improvement of the local centres to meet the needs of the local community. It will also require new development to be well integrated with the existing residential neighbourhoods. This includes improving connectivity with the Ebbsfleet development to the south and public access to the River Thames and Robin’s Creek to the north.

**Kimberly Clark site (sub-area 1.7)** comprises a flat area of land set at a low level adjoining the River Thames. It is separated from the Northfleet Cement Works Regeneration Area to the west by the chalk spine of Granby Road. The site is currently occupied by the Kimberly Clark tissue mill and associated buildings. The deep water wharf is used for the import of raw materials used in tissue manufacture and the transshipment of other goods.

It is anticipated that this use will continue beyond the plan period and the Council will support its continued operation and expansion. The Council will also support the extension of a heavy rail connection with the Lafarge site (in sub-area 1.5) to allow Kimberly Clark and the Northfleet Embankment East Regeneration Area access to the North Kent railway.

**Northfleet Embankment East Regeneration Area (sub-area 1.8)** comprises a relatively flat area of land set at a low level adjoining the River Thames lying to the north of a tall chalk cliff face. Road access to this area is primarily via Rosherville Way and Thames Way under a chalk spine carrying the B2175 London Road. Whilst much of the site is currently cleared and empty, the area has a long industrial past and was last occupied by the former Northfleet Power Station and AEI Cable Works (TT Electronics). STEMA Aggregates continue to operate from Red Lion Wharf in the north western part of the area, taking advantage of the deep water jetty that once served the power station.

There is an extant planning permission for a 40,000 square metre (GEA) distribution warehouse facility on land west of Rosherville Way and south of Crete Hall Road. It is understood that this will be implemented in due course.

Planning permission has also recently been granted to raise land on the former AEI Cable Works site and part of the former Power Station site. This will take it out of the flood risk zone. The Homes and Communities Agency is developing a masterplan for this site to promote its development for a multi-modal industrial and warehousing facility based on the heavy rail connection mentioned above and the availability of deep water wharfage. The site is expected to deliver a significant volume of jobs and therefore low density job development in B8 will not be suitable. This is likely to have implications for the operation of STEMA Aggregates at Red Lion Wharf but it is anticipated that this constraint could be overcome as the design, mix and layout of the site evolves. Should this not prove possible, priority will be given to the regeneration of the area over the aggregates use as to do otherwise would prejudice the delivery of the Core Strategy and effectively sterilise much of this important site (see also Policy CS11 Transport).

The eastern part of the sub-area is expected to accommodate residential development reinforcing the existing Rosherville North and Lansdowne Square Residential Area (sub-area 1.9). A buffer zone comprising open space, landscaping and B1 employment or
other appropriate uses will be required between this and the multi-modal industrial and warehousing facility to the west.

Development of this sub-area will need to have regard to any surviving heritage assets on site (including industrial archaeology and surviving remnants of the Rosherville Gardens complex) along with the need to maintain an east – west route for public transport and general traffic accessing the Imperial Business and Retail Estate and Gravesend town centre. Any development will also need to be appropriate given its proximity to the Lansdowne Square Conservation Area.

The Council supports the principle of development likely to come forward as a result of the existing planning permissions and the emerging masterplan. Current estimates are that this could comprise around 240 new dwellings and 95,000 square metres (GIA) of B1, B2 and B8 employment floorspace. This area is identified as a **Key Site**.

**Existing Rosherville North and Lansdowne Square Residential Area (sub-area 1.9)** consists mainly of an existing residential area that sit on a chalk spine above the River Thames and the former quarries to the east and west. Lansdowne Square is a conservation area and includes a small industrial area to the west (Janta Fashions and the former Art Deco AEI office block). The southern part of the sub-area lies within the The Overcliffe conservation area.

Except for the possible future redevelopment of the Janta Fashions site, linked to conversion of the AEI office block and development of the residential component of Northfleet Embankment East, it is unlikely that this area will be subject to substantial change over the plan period. However, adjoining development should be designed to improve connectivity and access to the riverside so that existing residents benefit from improvements to community facilities to be provided. As the Rosherville Quay walls, steps, drawdock and WWII mine watching post are listed, additional benefits could include the restoration of Rosherville pier and linking this to the public open space.

**Imperial Business Estate (sub-area 1.10)** mainly comprises an existing 1980s industrial estate. It is a busy employment area that is anticipated to remain in-situ over the plan period. A small undeveloped area adjacent to the western end of the former Clifton Marine Parade, the White House offices and Imperial Wharf complete the site. Except for possible rounding-off of employment uses, it is not anticipated that this sub-area will be subject to substantial change over the plan period.

**Policy CS03: Northfleet Embankment and Swanscombe Peninsula East Opportunity Area**

The Northfleet Embankment and Swanscombe Peninsula East Opportunity Area is a substantial opportunity for major riverside regeneration in Gravesham. Development will bring significant benefits to existing adjoining residential communities and the borough as a whole through the delivery of new housing and jobs whilst achieving environmental improvement, especially in air quality, and a high standard of design.
Any future proposals for the Swanscombe Peninsula East Undeveloped Area will be subject to a comprehensive masterplan approach which deals with the issues of flood risk, access, ground conditions, proximity to existing industrial uses, air quality, biodiversity, utilities, navigation and the presence of the HS1 railway line.

The Swanscombe Peninsula East Riverside Industrial Area, Kimberly Clark Site and Imperial Business Estate will be retained in employment use. The Council will support proposals which expand and support their operation.

The Council will support the regeneration for residential and employment uses of the Grove Road and Lower Ebbsfleet Area taking into account the issues of flood risk, ground conditions, heritage and archaeology and existing uses.

Development of the Key Sites will lead to the provision of approximately 970 dwellings and 114,336 (NIA) sq m employment floorspace providing around 2,314 new jobs. Development on the Key Sites will be in accordance with the principles set out below.

Land East of Grove Road and Robins Creek Key Site (within sub-area 1.3)

This will provide a residentially led mixed use development with the potential to create approximately 200 dwellings. Such development will be expected to: preserve, enhance and interpret the heritage assets in the locality; improve and enhance Robin’s Creek and the Ebbsfleet stream; improve and add to publicly accessible greenspace; and reduce heavy commercial traffic and parking on Grove Road. It will be well integrated with the Existing Old Northfleet Residential Area and the Old Northfleet Residential Extension.

Old Northfleet Residential Extension Key Site (sub-area 1.4)

This will provide a residential development of approximately 530 dwellings, open space, an extension and improvements to the Hive local centre, provision of community facilities and improvements to the rights of way network. It will reconnect the existing residential communities of the Existing Old Northfleet Residential Area with the River Thames.

Northfleet Cement Works Regeneration Area Key Site (sub-area 1.5)

This will provide an employment development of approximately 46,000 sq m new employment floorspace comprising business, industrial, and storage and distribution facilities (use classes B1, B2 and B8) and a Bulk Aggregates Import Terminal providing around 1,450 new jobs.

Northfleet Embankment East Regeneration Area Key Site (sub-area 1.8)

This will provide an employment led development of approximately 95,000 sq m new employment floorspace including a major multimodal industrial and warehousing development (use classes B1, B2 and B8) to provide around 935 new jobs. It will also provide approximately 240 dwellings at the eastern end of the site which will reinforce the existing adjacent residential areas. A buffer zone comprising open space, landscaping and business development (use class B1)
will be required between the residential development and the industrial and warehousing development.

Such development will be expected to maintain an east-west route for public transport and general traffic accessing the Imperial Business and Retail Estate and Gravesend town centre. It will improve connectively with the Existing Rosherville North and Lansdowne Square Residential Area.
Gravesend Riverside East and North East Gravesend Opportunity Area

Map 5: Gravesend Riverside East and North East Gravesend Opportunity Area
The Gravesend Riverside East and North East Gravesend Opportunity Area lies immediately to the east of Gravesend town centre, extending around 1.8 kilometres along the waterfront to the boundary of the urban area with the Metropolitan Green Belt. Included within this area is land to the south of the North Kent Railway, surrounding the Gravesend Wastewater Treatment Works, and north of existing residential development at Northcourt Estate and Dalefield Way. To the east, still south of the railway, lies the remainder of the Westcourt Marshes and Great Clane Lane Marshes. Part of this area is included within the South Thames Estuary Site of Special Scientific Interest (SSSI) and the Thames Estuary and Marshes Ramsar Site which means that it is of significant biodiversity value. The accompanying diagram shows the main sub-areas comprising this Opportunity Area.

Due to the severance effect of the railway and the Thames and Medway Canal, the area to the east of the Canal Basin and north of the railway is served almost entirely from the Ordnance Road junction. This links to the Gravesend town centre one-way system. This is a major constraint on what development and uses can be accommodated on the riverside because of the highway capacity, particularly at the junction, and any potential adverse environmental impacts of increased traffic on air quality. At North East Gravesend, capacity constraints at the junction of Dering Way and the Lion Roundabout will also need to be considered as well as impacts upon the wider highway network. The Borough Council retains the aspiration for a road bridge to be provided to link the areas to the north and south of the railway as it could bring environmental and public transport benefits. However, this is unlikely to occur during the plan period.

The Opportunity Area is in close proximity to the Thames Estuary and Marshes Special Protection Area (SPA) and Ramsar site to the east which are of international biodiversity importance, particularly for birds. Recent evidence suggests that there has been a decline in bird populations on this SPA/Ramsar site. There is currently insufficient evidence to adequately assess the cause of this decline although interim findings indicate that recreational activity causes disturbance to birds. Further work is being carried out in relation to this matter and a precautionary approach to development will be applied. This means that developers will be expected to provide sufficient alternatives for the recreation needs arising from their developments and implement other measures, which may include contributions to visitor control mechanisms and management of the SPA to ensure that detrimental impacts on the integrity of the SPA/Ramsar site are avoided.

There are important links for walkers and cyclists that connect Gravesend town centre with the North Kent Marshes beyond Mark Lane. These include the Saxon Shore Way long distance path and the SUSTRANS National Cycle Route 1 (NCR 1). These routes are currently of poor quality in a number of places but still very well used and the Council supports their upgrading as part of the Green Infrastructure and transport network. Policies CS12 on Green Infrastructure and CS11 on Transport are also relevant.

Considerable progress has been made in restoring and upgrading the Thames and Medway Canal as a contribution to the Green Infrastructure network. The section between the Canal Basin and Mark Lane has been infilled and the Council is seeking the reinstatement of this part of the canal where this is shown to be feasible. Where cost
precludes reinstatement at the time development takes place, the design will be required to facilitate future reinstatement.

A number of existing uses constrain the type and form of development likely to be acceptable in this Opportunity Area. These include the Gravesend Wastewater Treatment Works, the Metropolitan Police Training Centre and the Canal Road Gasholders. There are also a number of existing uses which demand a waterfront location because of the types of activity undertaken. These include the Denton Wharf (Port of London Authority), Denton Slipways (Ship Repairs) and Clubbs Wharf (Marine Dredged Aggregates).

**Canal Basin Regeneration Area (sub-area 2.1)** comprises Canal Basin itself and the area lying north of the gasholders as far east as the Denton Slipways site. The Canal Basin has been restored as part of the first phase of redevelopment of the area and is in active use as a boating marina. This complements the recreational function of the Riverside Leisure Area to the west and is the type of marine related use that the Borough Council would wish to see expand.

To the north and east of the Canal Basin lies an area that is currently in general employment use. The buildings are mainly old and in poor condition, with much of the land used for open storage. It has long been recognised that this area has potential for regeneration and it is shown as a **Key Site**. The Council’s approach to this area is that mixed-use regeneration will continue to be supported that complements the development which has already taken place to the south of the Canal Basin. This will comprise a mix of residential and business uses that have regard to the constraints imposed by its location in a flood risk area, the proximity of gasholders at Canal Road and its proximity to existing employment uses. A range of shops and services to serve the development and the existing residential area to the south should be included. There is a resolution to grant planning permission for such use.

The Canal Basin along with the locks, swing bridge and other associated features are grade II listed. There are thought to be significant buried archaeological remains associated with the canal, early railway, previous industrial uses and Albion Baths. It is also thought that there is a war grave containing the remains of Flight Sergeant Eric Williams from a world war two crash site around Albion Parade. These features will need to be investigated and the heritage interest preserved and interpreted. The Canal Basin was a maritime hub and, as such, is within the Gravesend Riverside Conservation Area. Any proposals will need to protect and enhance its setting of the conservation area.

**Canal Road Industrial Site and Canal Road Gasholders (sub-area 2.2)** comprises an area of land immediately south of the Canal Basin Regeneration Area. It is primarily in employment use. The presence of the gasholders is a major constraint on the potential redevelopment of the area as they have health and safety implications. It is understood that these are likely to remain in-situ over the plan period.

The Council considers that this area is likely to remain in active employment use over the plan period and the presence of the gasholders would largely preclude the introduction of residentially-led mixed use regeneration.
Riverside Industrial Area East of Canal Basin and Metropolitan Police Site (sub-area 2.3) comprises an extensive tract of riverside land extending 1,300 metres east of the Canal Basin Regeneration Area along Wharf Road and to the east of Mark Lane, north of the alignment of the former Thames and Medway Canal. It is currently well occupied by a range of business and other uses.

Denton Slipways is a significant river-related facility which should be retained as it provides a range of services supporting waterborne transport and business on the wider River Thames. The Metropolitan Police Training Centre at Mark Lane and the Port of London’s Denton Wharf also provide facilities that are strategically important. Clubb’s Wharf is also considered to be an important facility for the importation of marine dredged aggregates.

The Council’s approach is that the current role of the area should continue over the plan period and support will be given to proposals that improve the environment of the area. Strategic uses will be given protection from the encroachment of sensitive uses that may impede their operation.

It is understood that the Port of London Authority is currently considering the possibility of creating a Centre of Marine Excellence based on Denton Wharf and adjoining land. This could help to deliver further river-related services and diversify the local economy in the marine sector. The Council supports the expansion of such marine related employment uses that make active use of the waterfront between Denton Slipways and Denton Wharf.

Norfolk Road Industrial Area (sub-area 2.4) comprises the area lying south of the alignment of the former Thames and Medway Canal extending from the Canal Road Industrial Site and the Canal Road Gasholders site 450 metres to the east to Mark Lane. It is currently well occupied by a range of business uses.

The Council’s approach to this area is that its current role should continue over the plan period as it is an important component of existing employment land supply. Proposals to improve the environment of the area will be supported.

The first rural section of the former Thames and Medway Canal (sub-area 2.5) comprises a restored section of waterway lying immediately south of the North Kent Railway to the east of Mark Lane. The depth of channel has recently been increased as part of a publicly funded project and a pumping system installed to maintain water levels.

Whilst this part of the canal is not navigable, it is important for the contribution it makes towards the Green Infrastructure network. The northern tow-path carries the vehicular access to the Metropolitan Police Training Centre and the route is well used as part of the public rights of way network and Sustrans National Cycle Route 1 (NCR1). This part of the canal has been designated as a Local Wildlife Site.

The Council considers that the canal should be maintained in its current form and progressively restored as resources permit. Proposals that result in its loss will be resisted given the biodiversity, amenity and local heritage value of the feature.

North East Gravesend Regeneration Area (sub-area 2.6) comprises all the land lying south of the North Kent Railway and north of Dalefield Way and Dering Way. A
The proposed extension to the residential area south of Dalefield Way is also included within this sub-area.

This sub-area includes the Gravesend Wastewater Treatment Works which causes some odour issues. Parts of the sub area are also subject to noise pollution from the shooting range to the east of the Metropolitan Police Training Centre. This means that the location and type of development in this area will need to have regard to odour nuisance and noise pollution. This sub-area also includes a former landfill site. This is likely to be subject to contamination which would make it unsuitable for built development without significant remediation.

This sub-area abuts the Site of Special Scientific Interest (SSSI) and the Ramsar site which are important for their nature conservation interest. As outlined above, it will be imperative that developers address and mitigate any detrimental impacts on biodiversity.

Whilst some commercial development has occurred at the Lion Business Park immediately south of the Wastewater Treatment Works, this has yet to be completed. Other sites to the east and west have been allocated for employment use in the past and a number benefit from extant planning permissions or resolutions to grant planning permission. These sites are allocated for employment use as they are important to the future delivery of jobs in accordance with the strategy. Therefore, they are shown as part of the Key Site.

There is a resolution to grant planning permission for residential use on land to the east of the existing residential area at Dalefield Way. This will make an important contribution to housing land supply over the plan period and is also shown as part of the Key Site.

Both the employment and residential components will be expected to meet the open space needs of workers and residents on site and incorporate suitable boundary treatments to reduce the risk of recreational pressure on the adjacent protected sites of nature conservation value.

**Great Clane Lane Marshes and Westcourt Marshes (sub-area 2.7)** comprises an area of largely undeveloped marshland lying between the Green Belt boundary and the North East Gravesend Regeneration Area. Westcourt Marshes is part of the South Thames Estuary and Marshes SSSI and the biodiversity value of this area has been damaged by past operations. Some of the sub-area (including a ditch extending southwards along the boundary of sub-area 2.6) also forms part of the Thames Estuary and Marshes Ramsar site.

The proposals for residential and industrial development at the eastern end of Dalefield Way in the North East Gravesend Regeneration Area include proposals to restore the damaged part of Westcourt Marshes SSSI to a more favourable condition. These proposals are supported.

The evolving Thames Estuary 2100 Flood Risk Management Plan (see also Policy CS18 Climate Change) includes the proposal for a new north-south flood defence across the marshes to the north east of Gravesend. The alignment and form of this are not yet known. Given this and the significant biodiversity value of the area, the Council’s approach is that this area should remain undeveloped over the plan period.
Policy CS04: Gravesend Riverside East and North East Gravesend Opportunity Area

The Gravesend Riverside East and North East Gravesend Opportunity Area will be the subject of major riverside regeneration complemented by additional development to the south of the railway which improve the poor urban environment and make the most efficient use of vacant, derelict and underused land in the area. This will comprise a mix of uses including new housing, jobs and supporting development.

Development of the Key Sites will provide up to 780 dwellings and 25,494 (NIA) sq m employment floorspace which will generate around 692 jobs. Development on the key sites will be in accordance with the following quantities:

The Canal Basin Regeneration Area Key Site (sub-area 2.1) will provide a mixed use development of up to 650 dwellings, up to 3,800 sq m of mixed use commercial floorspace (use classes B1, A1-A5, D1 and D2) and up to 6,447 sq m employment floorspace (use class B1c) with the latter providing around 105 new jobs. The employment uses will be located in the southern part of the site to minimise the health and safety impacts which arise from the proximity of the gas holders.

The mix of commercial uses in the Canal Basin Regeneration Area Key Site will include shops, financial and professional services, food and drink related uses as well as non-residential institutions (such as day nursery or medical centre) and leisure (such as a health club or gym). These uses will be provided to serve the resident and daytime population of the development and will generally be focussed in a local centre.

The North East Gravesend Regeneration Area Key Site (sub-area 2.6) is made up of a number of areas which will provide up to 130 dwellings and up to 17,573 sq m employment floorspace (use classes B1, B2 and B8) providing around 410 new jobs.

The Canal Road Industrial Site, Canal Road Gasholders, Riverside Industrial Area East of Canal Basin, Metropolitan Police Site and Norfolk Road Industrial Area will be retained in employment use. The Council will support proposals which improve their operation and the quality of their environment.

Great Clane Lane Marshes and Westcourt Marshes will remain undeveloped. Proposals which restore the Site of Special Scientific Interest to a more favourable condition will be supported.

The Council will support proposals that increase marine related activity making active use of the River Thames. This will include support for recreational boating activity within the Canal Basin Regeneration Area and the expansion of marine related employment uses between Denton Wharf and Denton Slipways.
Proposals that have the potential to prejudice the operation of the Gravesend Wastewater Treatment Works or the strategic security related functions of the Metropolitan Police Training Centre, through the introduction of uses that are sensitive to the activities on these sites, will not be accepted unless it can be shown that any adverse impact can be fully mitigated.

Improvements will be sought to the Saxon Shore Way and SUSTRANS National Cycle Route 1.

The alignment of the former Thames and Medway Canal will be protected from development, with the objective of delivering a high quality multi-purpose Green Infrastructure link between the Canal Basin and Mark Lane that secures the reinstatement of the canal where it is viable to do so.
Gravesend Town Centre Opportunity Area

Map 6: Gravesend Town Centre Opportunity Area
Gravesend Town Centre lies in a central urban location on the River Thames waterfront, directly opposite Tilbury on the Essex shore. Occupying an area of ground that rises towards Windmill Hill to the south, it is an historic town intimately connected with the nation’s maritime past and the development of its overseas trade. For centuries, it has acted as the river gateway to the Port of London as well as being the central focus for the wider borough – it is without doubt a very special place and one with great potential.

The vision for Gravesend Town Centre is that, by the end of the plan period, it will have built upon its strengths as a commercial centre and heritage riverside town to establish itself as a dynamic and desirable place to live and work and be a focus for shopping, leisure, service provision, culture and tourism. Regeneration will have acted as a catalyst for the improvement of the town centre’s offer where high quality design and public realm will enhance the distinctive character of the centre.

Underlying principles of the planning system are that we should promote sustainable development whilst improving the town centre’s competitiveness and ensuring that its local character is preserved. It is important then that we identify the key characteristics of the town centre, whilst recognising opportunities for further improvement. In such a context, aspirations must be realistic and deliverable and, in order to achieve the overall vision for the town centre, an approach may need to be adopted that seeks to balance competing objectives.

The key features that make our town centre distinctive and special are:

- It is an important historic riverside town on one of the world’s great rivers that retains much of its architectural and heritage interest.
- It is a compact town that is built largely to a human scale.
- It is a traditional town with a mix of retail, service and residential uses.
- It is a well-connected town with good and improving transport links and good public car parking provision.
- It is a safe, clean and well-managed town and an attractive place to live, work and visit.

But there are also issues to resolve:

- Town centres need to constantly reinvent themselves if they are to remain relevant to the people who use them and to keep the mix of uses up-to-date and vibrant. This means that we have to make provision for modern retail, services and employment uses in terms of quantity, quality and range of supply whilst also accommodating new dwellings so more people can live there.
- As the town centre has much heritage interest, its form influences where new units designed to meet modern commercial needs can be located.
- Competition from other centres and opportunities to buy goods and services over the internet has changed the way in which people shop. As a result, some of the retail offer of the town centre has become dated, although the demand for modern retail units of a larger size to meet the requirements of multiple retailers remains.
- Commercial leisure provision within the town centre has declined over time, following trends seen nationally in this sector.
• The cultural offer of the town centre is limited and this reduces the town centre’s attractiveness as a heritage riverside town and place to visit.

• Whilst the environment of the town centre has been significantly upgraded over the past 20 years, further environmental improvements will be needed to ensure it remains a good place to live, work and visit and competes well with other centres.

• Some parts of the town centre are dominated by traffic resulting in noise and poor air quality with the one-way system being declared an Air Quality Management Area (AQMA). The existing one-way system also has an adverse impact in that it divides the core town centre from the riverside and badly affects one of our finest heritage assets – Harmer Street.

• The River Thames is one of our most important assets but the town centre fails to make the most of the advantages it brings – it has become increasingly disconnected from the river over time and some new developments have tended to block important views.

• Whilst the town centre benefits from its close proximity to the Riverside Leisure Area, it is recognised that open space provision elsewhere is constrained by urban form and available space but making it more pleasant and adaptable to climate change through additional greening would be beneficial.

The Gravesend Town Centre Opportunity Area not only includes the core of the town centre itself but adjoining areas that function together with it. The boundaries chosen are therefore similar to those used to on the Town Centre Inset Map for the Gravesham Local Plan Second Review Deposit Version (May 2000), extending from the Imperial Retail Park in the west to Gravesend Canal Basin in the east.

As noted above, the Town Centre benefits from good public car parking provision and these are distributed around the Opportunity Area. Some of these car parks are short stay, used mainly by shoppers and visitors. Others are long stay, used by people who work in the area and by those who commute by train to work. There are also car parks associated with the retail stores to the west of the town centre. The overall provision of public car parking in this area is currently being reviewed and the results will inform the future provision and distribution strategy to ensure an appropriate level of long and short stay parking is maintained. This car parking strategy will also be informed by the need to: reduce the adverse townscape impact of open car parking; make more efficient use of the land; manage traffic flows; and improve air quality.

The Council recognises the importance of the public realm and the built environment in this Opportunity Area, particularly in the core of the town centre itself. Some areas would benefit from public realm and environmental enhancements, e.g. Milton Road as an eastern gateway to the town, yards to the rear of Queen Street, areas to the rear of Harmer Street. Therefore, the Council will support environmental enhancements where opportunities arise, especially when new development comes forward. This is in accordance with Policy CS19 on Development and Design Principles.

This section continues by setting out the approach the Council will take toward the future development of the sub-areas comprised in the Opportunity Area. This, together with the policy that follows it, should be read in conjunction with Policy CS08 on Retail, Leisure and the Hierarchy of Centre which establishes the extent of the Primary Shopping Area (PSA) and Town Centre Commercial Core (TCCC) and how the National Planning Policy Framework (NPPF) sequential approach toward retail, leisure,
entertainment and the more intensive sport and recreation uses will be applied in Gravesham. Also of relevance are Policies CS07 on Economy, Employment and Skills and CS09 on Culture and Tourism that set out how the NPPF sequential approach will be applied in Gravesham toward the other main town centre uses (i.e. offices, arts, cultural and tourism development).

For the purposes of consistency, it should be noted that sub-area 3.1 (Town Centre) under this policy coincides with the boundaries of the Town Centre Commercial Core under Policy CS08.

The Sub-Areas comprised in the Gravesend Town Centre Opportunity Area are shown on the plan below.

**Town Centre Commercial Core (sub-area 3.1)**

The Town Centre Commercial Core (TCCC) represents the main commercial part of the town centre. It is relatively compact and has the main concentration of retail, leisure, cultural, tourist, civic and service facilities in the Borough. This includes shops, banks, restaurants, bars, the Towncentric visitor and information centre, Gravesham Community Hospital, Woodville theatre, and the Council’s offices. These serve the whole Borough. It also acts as a transport hub for both conventional and high speed train services as well as buses (see Transport section).

The town's main shopping area is centred around the St George’s Centre, Thamesgate Centre and the pedestrianised part of New Road. The units are mainly occupied by multiple retailers selling comparison goods (e.g. clothing, games and toys, books and stationery, jewellery) but there is also a Tesco food store providing convenience goods. There are a number of areas close to the main shopping area which consist of more independent shops, estate agents, banks, building societies, restaurants and pubs. These include: High Street; the indoor Borough Market; Queen Street; King Street; Windmill Street; Stone Street; Manor Road; Parrock Street; New Road (West); The Overcliffe; Darnley Road; and Barrack Row.

Much of this sub-area is within the defined Primary Shopping Area on the Policies Map (see Policy CS08 Retail, Leisure and the Hierarchy of Centres). The retail function of the area will be supported and enhanced. There is an identified need for more and better quality comparison goods retail floorspace in the Borough. Larger sized modern units are required to meet the needs of multiple retailers. There is also a need for better quality convenience goods retail floorspace in the Borough to improve competition and consumer choice. In accordance with the sequential approach set out in Policy CS08, the Primary Shopping Area should be the first priority for the location of such development. Given the townscape character and the scale of development anticipated, it is unlikely that it would be possible to accommodate all of this in the existing Primary Shopping Area. For this reason, a future extension to the Primary Shopping Area is proposed and further details are set out in Policy CS08.

The Town Centre Commercial Core has an important role in providing for an evening economy to serve the Borough. It is the first priority for the location of leisure, entertainment, culture and tourism development under Policy CS08 and support for the

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provision of cultural and tourist facilities is given in Policy CS09. There is scope for new restaurants, cafes, a cinema and hotels in the town centre, some of which could be accommodated on the Heritage Quarter key site (see below). There may also be potential for provision to be made on sites to the South of the Town Centre (sub-area 3.3) and details are given under the relevant sections. The Council will support proposals which retain and enhance the evening economy and provide improved leisure, entertainment, cultural and tourism facilities.

Given the Borough’s ageing population and the increasing number of residents locating in and around the town centre over the plan period, there will be an increasing need for supporting local services. As this part of the town centre is a transport hub with good public transport accessibility, it is a good location for such uses, as shown by the success of the Gravesham Gateway as a central service hub. The Council will support the retention or enhancement of services through Policy CS10 Physical and Social Infrastructure.

The Council supports improved public transport provision, including the development of a transport hub in Gravesend town centre to provide high quality interchange facilities between bus, rail, walking and cycling (see Policy CS11 Transport). Planning permission has been granted for an integrated public transport interchange at Garrick Street/Barrack Row immediately adjoining the railway station as well as a multi-storey car park. The one-way system has already been partly diverted. A further diversion would be required to take it away from Clive Road and create a new Rathmore Road link between Stone Street and Darnley Road. In the event that this scheme is not fully implemented, the Council would still require the provision of a public transport interchange in this location. Subject to the provisions of the car parking strategy, referred to above, it would also support the provision of offices in this location.

There are some larger scale office buildings located in this sub-area. Joynes House and the Civic Centre provide office employment. The Council would wish to see these maintained in office use over the plan period as they are part of the established Gravesend town centre office market and this would accord with the need to protect existing employment floorspace (see Policy CS07 Economy, Employment and Skills). In addition, there may also be opportunities to provide new office floorspace in the town centre for businesses wishing to locate to the town centre to exploit the potential offered by HS1 and these are referred to where relevant.

The eastern part of the Town Centre sub-area has significant heritage interest. Much of this is within one of a number of Conservation Areas, centred around High Street, King Street and Windmill Street. There are also a number of listed buildings including the grade II* listed Old Town Hall and St George’s Church. Policy CS20 Heritage and the Historic Environment will apply.

There are few open spaces in the sub-area. Provision has recently been improved by the enlargement and refurbishment of the square in front of the Civic Centre, now known as Community Square, as a result of changes to the one-way system.

A particular feature of the town centre is its public alleys, particularly to the east and west of High Street. These provide important pedestrian links, e.g. between Queen Street, High Street and St George’s Centre. There are also other important routes for pedestrians in the town centre, e.g. New Road West provides a pedestrian link to Asda.
superstore and Imperial Retail Park (in sub-area 3.2). It will be important to improve pedestrian connections where the opportunities arise, especially between new development, the historic High Street and the riverside as well as areas to the east and west of the town centre.

Lord Street is used as a temporary long stay car park. Whilst this site is within the town centre boundary, its future is most sensibly considered with Parrock Street car park which is outside the town centre within sub-area 3.3. This is discussed further below.

Apart from the Heritage Quarter key site below and the possible offices which may come forward as a result of development of the public transport interchange, there are a number of other sites which may be developed in this sub-area during the plan period. These are:

- former Cinema site on King Street which has the potential for retail units, offices and residential on the upper floors
- former Gala Bingo site on New Road West which has planning permission for retail/commercial uses on the ground floor with offices and residential uses on the upper floors

Ground floor premises in the rest of this sub-area are likely to continue with their existing retail, commercial and service functions over the plan period. The upper floors are currently a mix of offices and residential uses. Both are important to maintain a mix of development in the town centre, provide employment and add to the life and vibrancy of the area. The Council will support the continued provision of such uses and changes of use where a satisfactory living environment can be provided.

Heritage Quarter

Heritage Quarter West lies to the north of St George’s Centre which is part of the town’s main shopping area. It comprises a family centre, West Street open air car park, part of St George’s Centre car park and the Blockbuster store. Heritage Quarter East lies to the north of the Borough Market. It consists of the open air Horn Yard and Market Square car parks. Given the clear opportunities to make more efficient use of these under-used areas, improve townscape character and improve links to the river, High Street and surrounding areas, both are identified as a Key Site.

An extension to the Primary Shopping Area is proposed at Heritage Quarter West to meet some of the Borough’s future needs for comparison retail floorspace (see Policy CS11 Retail). This part of the key site would function as a logical extension to St George’s Centre and be located relatively close to the proposed public transport interchange. It is anticipated that it could accommodate up to X sq m comparison retail floorspace. Convenience retail floorspace may also provided. Heritage Quarter East could provide complementary uses such as restaurants and bars which help improve the town’s evening economy and an hotel to improve tourist provision. The key site could also accommodate residential development, especially Heritage Quarter East, and make provision for office uses. It would need to make provision for public car parking to replace that lost as a result of development.

It will be important that proposals for the Heritage Quarter key site: are appropriate to context; fully integrate with the existing townscape; preserve key views to and from the river; improve the public realm; and enhance the setting of the key heritage assets
including the grade II* listed St George’s Church in accordance with policies CS18 and CS19. It is also important that development improves pedestrian connections with the historic High Street and the riverside and Imperial Retail Park and Asda superstore to the west. There will be a requirement for this development to improve the open space at St Andrews Gardens (within sub-area 3.4) for existing and new residents and visitors.

West of Town Centre (sub-area 3.2)

This sub-area is bisected by Thames Way. To the north lies Imperial Retail Park which provides retail warehouse type facilities and to the south west lies the Asda superstore. These are located in a former chalk quarry and there is a steep cliff face between Asda and The Overcliffe but an escalator provides a pedestrian link between the two. To the south east of Thames Way is the Wickes DIY store which sits at a higher level from it. Wickes is accessed from Stuart Road and this road also includes a number of residential properties. The number of large retail stores in this sub-area means that large areas are used for associated car parking. To the east of Stuart Road lies the redundant M block, part of the former hospital on the site. There is also a small area of residential properties to the south of The Overcliffe.

There are opportunities to make more efficient use of under-used sites in this sub-area which would also improve townscape character, e.g. the redevelopment of the Wickes site. There are also opportunities to improve links between Asda/Imperial Retail Park and the town centre, e.g. the provision of further decked parking at Asda could create a link to The Overcliffe. The Council will support such proposals. It is likely that the M Block site will be redeveloped for residential use during the plan period and this should include active uses on the ground floor to help create a more pedestrian friendly route to Imperial Retail Park. The existing residential areas are likely to remain over the plan period.

South of Town Centre (sub-area 3.3)

There are a number of larger scale office buildings located in this sub-area. The former Police Station on Windmill Street is vacant. The Council considers that this site is suitable for a range of town centre uses including a significant component of residential development. Active commercial uses should occupy the ground floor to complement the Woodville Theatre to the north and existing business uses on the east side of Windmill Street. The site currently has an outstanding planning permission for redevelopment to provide residential uses on the upper floors and shops / financial and professional services / business / non-residential institutions (use classes A1/A2/B1/D1) on the ground floor. Cygnet House, which is also vacant, has planning permission for conversion to a hotel. The Council would also support the provision of replacement offices on this site. Given that it is an unsympathetic building in the Upper Windmill Street Conservation Area, preference would be for redevelopment of the site.

The Lord Street/Parrock Street sites are used as car parks. There is a planning permission for the Lord Street car park site, involving the provision of residential development, live-work units and commercial/community floorspace at ground floor level along the street frontages. The sites may offer scope for mixed use development but their future will depend on the outcome of work being carried out on public car parking provision. Lord Street is within the defined town centre and Parrock Street is just outside it and neither site is within the Primary Shopping Area. It may be possible to
accommodate additional retail / leisure / hotel / office uses and/or residential development on one or both of the sites but the sequential approaches to these uses outlined in Policies CS08 Retail, Leisure and the Hierarchy of Centres and Policy CS07 Economy, Employment and Skills will be applied.

Outside these development sites, there is a mixture of predominantly commercial uses which are likely to remain over the plan period. The shops on the east side of Parrock Street are peripheral to the town centre and their role will be considered if the Lord Street/Parrock Street sites come forward for regeneration.

East of Town Centre and Riverside (sub-area 3.4)

This sub-area is centred around Thames Riverside, Harmer Street and Milton Road. It is largely residential though there are pockets of land in employment use and some ground floor retail uses. There are some open spaces and a number of piers along the Riverside.

The Thames Riverside in this location significantly contributes to Gravesend’s role as a riverside heritage town. The Town Pier has been refurbished and a pontoon has recently been installed to allow access to visiting craft and the Gravesend-Tilbury Ferry. The Saxon Shore Way and Wealdway long distance walking routes both start at the town pier whilst National Cycle Route 1 runs along this part of West Street. There are also open spaces (see further details below). The Council will seek to improve public access to the riverside. It will also require proposals to maintain and enhance riverside character and views in accordance with Policy CS19 Development and Design Principles.

Harmer Street and Berkley Crescent were historically a mixed use area with retail and business premises on the ground floor with residential above. This has changed over time. It suffers from a poor environment due to its location on the one way system and the resulting poor air quality and disturbance from traffic. The Council will support the provision of offices and financial and professional services in this area. It will also allow the conversion of upper floors to residential use where a satisfactory living environment can be provided.

Milton Road consists of a number of retail and restaurant uses at ground floor level. The retail units are peripheral to the town centre and this area is considered to perform a local centre function serving the residents of this area and surrounding areas. The Council supports this role for the area and proposes this as a new local centre under for the future Site Allocations and Development Management Policies DPD.

This sub-area has significant heritage interest. Much of it is within one of a number of a Conservation Areas. There are also a significant amount of listed buildings, particularly along Harmer Street, Berkley Crescent and the Clocktower which are distinctive historic features of Gravesend’s townscape. New Tavern Fort and Milton Chantry within the Riverside Leisure Area and Gravesend Blockhouse along the riverfront are Scheduled Monuments. Policy CS20 Heritage and the Historic Environment will apply.

This sub-area includes some areas of open space. Riverside Leisure area lies in the east of the sub-area. It is a large open space which forms an important part of the Green Infrastructure network as it serves both the local area and the wider Borough, with
many leisure events held in this location. The area has recently benefitted from some improvements but there may be further opportunities, especially linked to the Canal Basin Regeneration Area key site to the east. St Andrews Gardens alongside the river is an important area of open space close to the town centre. It is not currently meeting its full recreational potential. The Council will seek to improve the recreational potential of both these areas and policies CS12 on Green Infrastructure and CS13 on Green Space, Sport and Recreation are also relevant.

There are a number of larger scale office buildings located in this sub-area. The Port of London Authority (PLA) Offices and associated land around Royal Terrace Pier form part of the river-related employment in the Borough. The Post Office, Stephenson House and Department for Work and Pensions buildings on The Grove to the south of Milton Road also provide employment. There are also some smaller employment sites interspersed with residential uses to the north and south of Milton Road, including Milton Road Business Park and Bentley Street Industrial Estate. These serve the needs of smaller scale businesses requiring a central location, although the type and scale of these activities is constrained by their proximity to residential areas and local road access. The strategy for employment sites is to protect employment floorspace unless it is truly redundant for modern needs, support the refurbishment and upgrading of existing premises and facilitate the expansion of river-related employment (see policy CS07 Economy, Employment and Skills).

The remainder of the area is largely residential. This includes a mix of modern flatted developments alongside the river, terraced houses to the north and south of Milton Road and around Royal Terrace Pier, and some post war flatted development to the west of Harmer Street. These areas are likely to remain in residential use over the plan period. It is likely that the Clifton Slipways/West Street pier site will be redeveloped for residential use.

Policy CS05: Gravesend Town Centre Opportunity Area

The Gravesend Town Centre Opportunity Area will be the principal focus for town centre related economic and social activity in the Borough. This will be achieved by consolidating the existing retail area, encouraging a mix of employment and residential uses, improving its role as a transport hub by the creation of a public transport interchange, promoting an evening economy through giving support to the provision of leisure uses and taking full advantage of its heritage and riverside setting.

Development of the Key Site will provide up to 327 dwellings and 9,231 sq m employment floorspace providing around 473 new jobs. This development is comprised of the Heritage Quarter Key Site. It will provide a high quality, mixed use development of up to 327 dwellings, 7,340 sq m of comparison retail floorspace in the Primary Shopping Area extension, up to 1,591 sq m leisure floorspace (use classes A3, A4 and A5), 300 sq m office floorspace (use class B1a) and an hotel. It will reconnect the town centre with the River Thames, High Street and surrounding areas and reinforce Gravesend’s character as a riverside heritage town. Replacement public car parking and improvements to the open space at St Andrews Gardens will be provided.
Within the Opportunity Area, the Council will:

- Seek to improve pedestrian access between the town centre, the River Thames and surrounding areas and reduce the physical barriers created by the one-way system;
- Manage traffic accessing and passing through the area through its approach towards the provision and distribution of public car parks;
- Support the provision of an integrated transport interchange at Garrick Street/Barrack Row;
- Support and enhance retail, leisure, entertainment, cultural and tourism provision in accordance with the sequential approach;
- Support the provision of new offices in accordance with the sequential approach, in particular where they have good access to the proposed integrated transport interchange;
- Support the provision of new residential development where a satisfactory living environment can be achieved;
- Support the redevelopment of under-used sites where this makes more efficient use of the sites and improves townscape character;

Support existing retail, commercial and service functions on the ground floors of the town centre over plan period and the provision of offices and residential uses on upper floors subject to achieving a satisfactory living environment.
Ebbsfleet (Gravesham) Opportunity Area

Map 6: Ebbsfleet (Gravesham) Opportunity Area
The Ebbsfleet (Gravesham) Opportunity Area lies immediately east of the boundary with Dartford Borough and Ebbsfleet International railway station, south of the North Kent railway line and west of Springhead Road. This area has previously been the subject of mineral working and the Springhead area as farmland. The sub-area is partly occupied by the High Speed 1 (HS1) railway line and an extensive network of highways including the A226 (Thames Way) and A2260 (Ebbsfleet Gateway), as well as a small part of one of the station car parks. The valley floor is largely flat and low lying but rises to the east and south where both industrial and residential development has already taken place at Springhead Enterprise Park and Springhead Park (Springhead Quarter). The Northfleet Wastewater Treatment Works and the Blue Lake (a water-filled quarry) occupy central locations to the south of Thames Way. The accompanying diagram shows the main sub-areas comprising this Opportunity Area.

Northfleet Rise Quarter and Springhead Quarter (sub-areas 4.1 and 4.2)

The immediate area around the Ebbsfleet International railway station in both Dartford and Gravesham Boroughs has long been identified as the location for a major business district in a mixed settlement with the opportunity to create a regional transport hub around the international rail station. The jobs potential of the site was a major reason for the Government selecting the location as the preferred option for an intermediate station on the then Channel Tunnel Rail Link in 1994.

Outline planning permission was granted by both Gravesham and Dartford Boroughs in 2002 for a comprehensive mixed use public transport oriented development across the Ebbsfleet Valley. This split the site into four linked quarters – two in Dartford (Station Quarter North and Station Quarter South) and two in Gravesham (Northfleet Rise and Springhead). Within Gravesham, up to 1,064 dwellings and up to 125,000 sq m business employment floorspace plus supporting uses was granted planning permission. Although the planning permissions are flexible, the vision has been for a high density office employment driven, mixed use development which is public transport oriented and has supporting infrastructure to meet the needs of the resident and daytime population, making the most of its proximity to the international railway station.

Quarter Master Plans have been approved across the site to reflect the above approach. Detailed plans have also been approved for much of Springhead Quarter, where the emphasis has been on providing residential development. 206 dwellings had been completed by the end of March 2011. A recent Committee resolution to approve changes to the planning permission means that Springhead Quarter is likely to be a more residential led development whilst Northfleet Rise Quarter is likely to be a more employment led development. Despite international rail services having operated from 2007 and domestic rail services from 2009, no commercial development has occurred to date. This period has coincided with the economic recession and the emergence of competing developments at Stratford in East London. However, the vision for the site in both Dartford and Gravesham remains the same.

Springhead Quarter and Northfleet Rise Quarter are shown as Key Sites capable of accommodating the levels of development set out in the 2002 outline planning permission with the development mix on each quarter reflecting the recent resolution to approve changes to the planning permission. Discussions with the developer indicate that the delivery of this development is likely to be over a longer time-span than was originally envisaged and this is reflected in the policy.
The Council will require the provision of measures to ensure that a public transport oriented development is delivered in accordance with the vision. This will include the provision of bus services, footpath and cycle links to connect the different quarters, to provide easy access to the station and to provide wider access to the surrounding area. As part of this, the developer will be expected to provide a bridge link between Springhead Quarter and the Ebbsfleet Station access road.

To further encourage a high proportion of trips by sustainable means and discourage the need to travel by private car, the Council supports the development of a transport hub at Ebbsfleet to provide high quality interchange facilities between bus, rail, walking and cycling. It also supports the provision of a dedicated pedestrian and cycle link between Ebbsfleet and Northfleet stations. Further details are set out under Policy CS11 Transport.

The planning permission identifies a number of transport schemes that the full development would require, in Gravesham and Dartford, though the precise form of these will depend on the actual development, phasing and the cumulative implications of proposals for other sites that feed off the same transport system.

There are a number of car parks which serve Ebbsfleet station. These are mainly located in Dartford Borough. As a result of a development agreement with the Government, the developer has the right to build on the car parks serving Ebbsfleet station provided that any spaces that are displaced are replaced in a suitable location or form. Therefore, provision will need to be made for replacement car parking within the Ebbsfleet development site.

Northfleet sidings, adjoining Northfleet railway station, has been reinstated, restoring the connection between the North Kent Line and the site of the former Northfleet Cement Works.

The proximity of the key sites to the Northfleet Wastewater Treatment Works (sub-area 4.3) and the high speed railway line mean that they could be subject to odour and noise pollution. As a result, the location and type of development will need to have regard to these. Less sensitive buffer uses such as employment may need to be located between residential development and the sources of the pollution to mitigate the impacts. A high voltage power line also runs along the southern part of Springhead Quarter and the layout of development will also need to have regard to this.

The Ebbsfleet stream runs along the western part of the two quarters. Both the stream and the surrounding reedbeds and slopes have biodiversity interest and are part of the Ebbsfleet Marshes Local Wildlife Site. A public right of way runs along much of it. The Council will require the improvement and management of the Ebbsfleet stream corridor as part of wider greenspace and Green Infrastructure provision within the new development.

Part of the Ebbsfleet Neolithic Site Scheduled Monument is within Northfleet Rise Quarter. Both quarters are also areas of archaeological search which reflect that it is the site of a former Roman settlement. The Council will require the preservation and interpretation of the site’s heritage assets in accordance with Policy CS20 Heritage and the Historic Environment.
Northfleet Wastewater Treatment Works (sub-area 4.3) lies to the west of the Springhead Enterprise Park and south of Blue Lake. The plant here has recently been upgraded to increase capacity and to meet European Directive requirements. It is anticipated that this use will remain over the plan period. The Council recognises that it is a potential source of odour pollution and development proposals will need to reflect this.

Springhead Enterprise Park (sub-area 4.4) lies to the west of Springhead Road and south of Thames Way, immediately adjacent to the new residential development at Springhead Park (Springhead Quarter) and the Northfleet Wastewater Treatment Works. It is a well established employment location consisting of a range of light and general industrial and warehouse units of different sizes. It has good levels of occupation although some of the larger units are more difficult to let. The Council considers that this area is likely to remain in employment use over the plan period. Proposals that result in improvements to the site and its employment carrying potential within the same range of uses will be supported.

Blue Lake (sub-area 4.5) is a deep water filled quarry lying to the north of Thames Way. The site is currently fenced to prevent unauthorised access due to the dangers associated with such workings but is used by a local fishing club. Water is abstracted from the lake to serve the Kimberly Clark tissue mill in the Swanscombe and Northfleet Riverside Opportunity Area. It is understood that no other abstraction takes place other than to maintain levels and to prevent flooding. The site is part of the Ebbsfleet Marshes Local Wildlife Site which means that it has some nature conservation value. However, it is understood that there is a degree of saline intrusion due to the proximity of the area to the River Thames.

The Council considers that Blue Lake will remain in its current use over the plan period. It would support proposals that better integrate the lake with the Northfleet Rise Quarter Key Site, secure environmental improvements and improve its biodiversity value whilst not prejudicing public safety and the abstraction of water for industrial purposes. It may be possible to increase use of the area for leisure purposes or introduce floating uses such as offices or hotel facilities. This would bring the area into active use and provide an income stream for its future maintenance and improvement.

**Policy CS06: Ebbsfleet (Gravesham) Opportunity Area**

The Ebbsfleet (Gravesham) Opportunity Area is a substantial opportunity for a high quality, sustainable, mixed use development in line with the longstanding strategy to create a major business district at Ebbsfleet within Dartford as well as Gravesham. Development will bring significant benefits to the borough and surrounding communities through the delivery of new housing, high quality jobs and supporting facilities centred around and well linked to the Ebbsfleet Station transport hub.

Development of the Key Sites will lead to the provision of:

- up to 672 dwellings (in addition to the 206 dwellings which were already built at 31 March 2011);
• up to 125,000 sq m business employment floorspace (use classes B1a, B1b and B1c) with a minimum of 20,000 sq m business employment floorspace being provided during the plan period providing around 1,400 new jobs\(^\text{16}\);
• up to 3,750 sq m retail floorspace (use class A1);
• up to 2,500 sq m leisure/entertainment floorspace (use class D2); and
• other supporting facilities, hotels and restaurants.

Development of the Key Sites will be in accordance with the principles set out below.

The Springhead Quarter Key Site will provide a residentially led mixed use development with the potential to create up to 672 dwellings (in addition to the 206 dwellings which were already built at 31 March 2011), a minimum of 20,000 sq m business employment floorspace (use classes B1a, B1b and B1c) and up to 1,000 sq m retail floorspace (use class A1).

The Northfleet Rise Quarter Key Site will provide an employment led mixed use development with the potential to create up to 120,000 sq m business employment floorspace in a high density business district (use classes B1a, B1b and B1c), up to 164 dwellings, up to 2,750 sq m retail floorspace (use class A1); up to 2,000 sq m leisure/entertainment floorspace (use class D2); and hotels and restaurants.

Retailing will be provided to meet the needs of the resident and daytime population and should safeguard the role of Gravesend town centre as the primary retail centre.

Facilities will be provided to support development of the Springhead Quarter and Northfleet Rise Quarter Key Sites and will be accessible to both existing and future communities. These will include the provision of educational, health, social care, sports and community facilities, open space to meet a variety of needs and recycling and waste transfer facilities. These will be provided in accordance with the phasing schedule set out in the Infrastructure Delivery Plan.

Development will be designed to be public transport oriented to encourage a high proportion of trips by sustainable means and discourage the need to travel by private car. This will be achieved by the provision of frequent bus services and a high quality network of publicly accessible footpath and cycle links between the Springhead Quarter Key Site, Northfleet Rise Quarter Key Site and the Dartford Quarters of the development, Ebbsfleet Station and Northfleet. This will include the provision of a bridge over the Ebbsfleet stream to provide a pedestrian, cycle and road link between the Springhead Quarter Key Site and Ebbsfleet Station access road.

The Council will support the creation of an enhanced transport hub at Ebbsfleet Station (in the Dartford Borough Council area) providing high quality interchange facilities between bus, rail, walking and cycling and the provision of high quality dedicated pedestrian and cycle links between Ebbsfleet and Northfleet stations.

\(^{\text{16}}\) Figure based on B1a floorspace – See X for information on how this has been calculated
Provision will be made for replacement car parking to serve Ebbsfleet Station if any is displaced by development.

The layout of development and mix of uses will have regard to railway noise from HS1 and odour from Northfleet Wastewater Treatment Works. Employment or other buffer uses may be required between new residential development and this infrastructure to mitigate the impact of noise and odour.

A network of multi-functional, accessible greenspace will be provided forming part of the wider Green Infrastructure network to meet the needs of the resident and daytime population and to enhance biodiversity. This will include the improvement and management of the Ebbsfleet stream corridor.

The Springhead Enterprise Park will be retained in employment use. The Council will support proposals which increase its employment potential and make it more responsive to the market.

The Council will support proposals for Blue Lake that better integrate it with the Northfleet Rise Quarter Key Site, secure environmental improvements, increase its nature conservation value and introduce more beneficial uses where these are compatible with the need to maintain its water abstraction functions and public safety.

Core Strategy Part 2 – Borough-wide Policies

5. Borough-wide Policies

Economy, Employment and Skills

Gravesham’s local economy is one of the smallest in Kent. The loss of employment in the lower skilled traditional sectors coupled with limited growth in the higher skilled, professional and office based sectors to replace this loss, together with a lack of well located, modern premises and a poorly skilled workforce, have constrained local economic growth. This has resulted in a low number of jobs per head of population with significant numbers of people having to travel outside the Borough for employment.

Opportunities exist to capitalise on the strengths of the area to improve its economic position. These include taking advantage of investment in High Speed Rail connections and the associated development of Ebbsfleet; proximity to the A2/M25 trunk roads; the opportunities afforded by new technology, the availability of previously developed sites to accommodate new employment; and the borough’s riverside location and heritage.

The approach set out below has been developed against a backdrop of national economic uncertainty that has the potential to affect investment decisions and timing of delivery of jobs at the local level. Given there is no certainty about the economic upturn, either in terms of when it will come or how strong that recovery will be, the Council’s
economic strategy will enable the borough to benefit from the economic upturn, if and when it does come.

In recognition of the above factors, the Council aims to make Gravesham a place where enterprise can thrive in a sustainable and responsible way; building on its strengths to increase economic diversity so that the local economy is more adaptable and resilient to change; and facilitating the provision of education and skills to enable local people to prosper by taking advantage of the employment opportunities that arise.

Whilst the Council recognises that jobs can be delivered from a range of sectors, the Council's focus is to ensure that there is sufficient land for B class employment, which includes offices, industrial and storage and distribution uses, and the range of job opportunities that this can provide.

It will seek to achieve this by making provision for a minimum 4,600 new Full Time Equivalent (FTE) jobs in all sectors by:

- providing for a generous supply of employment sites, to allow market choice and to enable the regeneration of identified sites to appropriate uses;
- ensuring a range of provision for all employment sectors, to allow firms to start-up, grow and adapt to change;
- supporting office development at Ebbsfleet and in Gravesend Town Centre, to expand activity in an under-represented sector;
- supporting the expansion of commercial use of the riverside, where it does not conflict with other stated regeneration objectives;
- protecting existing employment sites, unless they are truly redundant for modern needs or identified elsewhere in this strategy as regeneration opportunities;
- supporting improvements in information technology, to increase competitiveness and flexible working practices; and
- supporting proposals that enable local residents to improve and diversify their skills and qualifications.

The jobs target is broadly based on a ratio of 1 FTE job per new dwelling over the plan period. Further detail on how this figure has been derived is set out in the Economy, Employment and Skills Background Paper. It should be noted that the policy approach set out below focuses primarily on the approach to B class employment uses whilst not disregarding the important contribution from other sectors. The Council’s approach towards meeting retail and commercial leisure, cultural, and tourism needs (which also have the potential to generate employment, along with other land uses) can be found in policies CS08 and CS09.

The National Planning Policy Framework (NPPF) requires that the local planning authority set out a clear economic vision and strategy for their area to encourage sustainable economic growth. Priority areas should be identified for economic regeneration with sufficient sites available for local and inward investment to match the strategy. Policies should also be flexible enough to accommodate needs that have not been anticipated over the Plan period.

The NPPF also states as a general principle that local planning authorities should avoid the long term protection of sites allocated for employment use where there is no
reasonable prospect of a site being used for that purpose. In addition, it advises that planning applications for changes of use from commercial buildings (currently under the B use classes) to residential use and any associated development should normally be approved where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate. The weak economy and the need to take a precautionary principle to employment land release e.g. new provided before releases are considered, provide the strong economic reasons for the Councils approach in this policy.

The context within which Gravesham’s approach toward the economy, employment and skills has been developed is the South East Plan and the designation of the borough north of the A2 as part of Kent Thames Gateway. This envisaged the creation of a new sub-regional employment hub at Ebbsfleet that would allow for the development of a high density mixed-use office based scheme delivering more than 20,000 jobs in Dartford and Gravesham.

Whilst the Council supports this, no employment floorspace has yet been delivered and it is only likely to come forward post 2021. The policy approach set out below is therefore based on the assumption that Ebbsfleet will come forward as a high density B1, office employment driven, mixed used development, acting as a key economic driver across North Kent but that this will be slower than originally anticipated.

This context, coupled with the uncertain economic conditions nationally, underline the need to diversify and reinforce the local economy – it is important that the Council is not overly reliant on one development to drive forward jobs and prosperity and its response is sufficiently flexible to accommodate a range of contingencies.

To address these factors and the need to off-set loss of existing supply at identified regeneration sites, the Council has planned initially for a generous level of supply of employment land. The monitoring framework will guide the subsequent release of land if it is later found to be surplus, suitable for alternative uses, and has the ability to contribute toward the delivery of sustainable forms of development needed in the area.

Table 4 sets out in broad terms, the distribution of new employment floorspace and number of jobs to be delivered over the plan period. CS policies 3 – 6 set the detailed policy requirements in respect of each of the Opportunity Areas.

**Table 4: Indicative delivery of new employment floorspace and jobs**

<table>
<thead>
<tr>
<th>Opportunity Area</th>
<th>Floorspace sq.m (Net)</th>
<th>Category of B Class Floorspace</th>
<th>Approximate FTE B Class Jobs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ebbsfleet Valley Opportunity Area</td>
<td>17,000 (Minimum)</td>
<td>B1(a) Offices, B1b and B1c</td>
<td>1,416</td>
</tr>
<tr>
<td>Northfleet Embankment and Swanscombe Peninsula East Opportunity Area</td>
<td>113,511 (of which, around 65,000 sqm net larger scale warehouse and multi-modal logistics development)</td>
<td>B1(a) Offices; B1(c) Light Industrial; B2 General Industrial; B8 Warehouse &amp; Distribution</td>
<td>2,170</td>
</tr>
<tr>
<td>Gravesend Town</td>
<td>4,817</td>
<td>B1(a) Offices</td>
<td>401</td>
</tr>
</tbody>
</table>
The Economy and Employment Space Study (2009) looked at opportunities for growth and identified a high potential to grow employment in the construction and hotels/catering sectors, subject to the Ebbsfleet development coming on stream. Prospects were described as moderate for marine-related industries; distribution; advanced manufacturing/engineering; media and telecommunications; and retail/leisure. It also identified opportunities for growing the Gravesend Town Centre office market based on improved rail accessibility and developing a role related to creative, media and design activity. A site at Coldharbour Road was identified as a particular opportunity to bring forward an Enterprise Centre meeting the needs of expanding small and medium sized firms and the provision of incubation space for small business start-ups well located relative to the main road network.

The Council proposes to capitalise on these opportunities for local economic growth and diversification by the creation and expansion of office based employment at Ebbsfleet and Gravesend Town Centre; new employment opportunities delivered as part of the mixed-use development of Northfleet Embankment West (see Northfleet Embankment Swanscombe Peninsula East Opportunity Area sub-areas 1.4 and 1.5), Gravesend Riverside East and North East Gravesend; proposals for larger scale warehousing and multi-modal logistics facilities at Northfleet Embankment East (sub-area 1.8); support for the expansion of commercial use of the riverside and associated marine activities; and by seeking improvements to information technology.

Aside from the sites identified for the delivery of new jobs set out in the policy, the potential exists for further development at Swanscombe Peninsula East. However, this is likely to be a longer term option requiring significant improvements to infrastructure and joint working with key stakeholders (including Dartford Borough Council) in order to develop a coherent masterplan approach that addresses both constraints and the potential that exists to improve green infrastructure, biodiversity and access to the River Thames in appropriate locations. Progressing work in this area will require significant resources that are currently not available.

Protection of existing employment sites
As a result of the inherent weakness of the Gravesham local economy and the need to expand it to support choice, diversity and sustainable lifestyles, the Council considers it is important to protect existing employment sites - unless they are truly redundant to modern needs or have been identified through this Core Strategy as suitable for regeneration to alternative uses.
The Economy and Employment Space Study (2009) examined in detail existing and potential B Class employment land supply in the borough, taking into account the quality and accessibility of the various sites. This found that much of the stock was comprised of older premises with many poorly located. The lack of supply of good quality modern premises in the right places was seen as a factor in affecting levels of demand. However, the stock makes an important contribution to meeting local needs and little scope to release for sites for redevelopment was identified.

The future of existing B Class employment sites and the potential for flexibility in terms of the types of jobs they might accommodate will be considered in more detail through the Site Allocations and Development Management Policies DPD. In the interim, a criteria based approach using market testing will be applied to assess whether sites should be released to alternative uses.

A similar approach is adopted to marine related uses, such as commercial wharves and land-side support infrastructure, given the potential for such sites to be lost to higher value uses taking advantage of attractive riverside locations. Policy CS 11 on Transport also applies where wharves are safeguarded in order to protect the movement of freight and other goods by water. Exceptions to this approach are allowed under policy where sites have specifically been identified to support other regeneration objectives.

Rural Area
There are few major employment sites within the rural area and supply within or adjacent to the villages tends to be dominated by small sites. However, such sites do facilitate sustainable lifestyles by providing opportunities for people to live and work locally and they also help to support the delivery of local services. As identified in the Economy and Employment Space Study, 2009, interest in new employment space in the rural area is low and opportunities are constrained by the Green Belt. It is not, therefore, proposed to allocate additional land for such uses. Any future demand for employment space will therefore be met through the retention and refurbishment of existing employment space and supporting the appropriate conversion of rural buildings in suitable locations to employment use, including that for culture and tourism (see CS09) or for the creation of live-work units, so long as the work element is a reasonable proportion. In assessing proposals, regard will be given to the sensitivity of the location of the development and the protection of the Green Belt.

Offices
The Council’s approach to locating office employment is influenced by existing planning permissions and the desire to bring forward sustainable mixed-use developments, reducing the need to travel to work; the identification of Ebbsfleet as a future sub-regional office / B1 location, with the potential to reduce out-commuting and to make more efficient use of the rail network by encouraging reverse-commuting; and a recognition of the potential of Gravesend Town Centre as an office location, based on High Speed Rail and improved connectivity with London.

The inclusion of B1(a) office floorspace as part of the mixed-use development of key sites included in the Opportunity Areas set out in Table X above will therefore continue to be supported. However, any further proposals for office development exceeding the 2,500 sq.m threshold will be expected to follow the Sequential and Impact tests as set out in the NPPF. In applying this policy, both Gravesend Station and Ebbsfleet Station
(in Dartford) will be considered to be transport interchanges and sites in Gravesham lying within 500 metres walking distance will be considered ‘edge-of-centre’.  

In applying this policy, the Gravesend Town Centre Commercial Core (see Policy CS05 on Gravesend Town Centre Opportunity Area and the Policies Map for extent) will be treated as ‘in-centre’. Both Gravesend Station and Ebbsfleet Station (in Dartford) will be considered to be transport interchanges and sites in Gravesham lying within 500 metres walking distance will be considered ‘edge-of-centre’.

Skills
For local residents to take advantage of employment opportunities that arise, it is important that they are equipped with the necessary skills. Conversely, it is important that economic growth is not constrained by the lack of a suitably skilled labour force. Recent investment in educational facilities in Gravesham provide a foundation for the delivery of skills training and it is anticipated that further planned investment will result in the upgrading of a number of other school premises. The potential to deliver skills training packages by agreement with the developers of major sites should also not be overlooked.

The Council will therefore continue to support planned investment in the upgrading of educational and training facilities necessary to deliver employment and other skills and will work with the developers of major sites to secure associated skills training packages through Section 106 Agreements.

Policy CS07: Economy, Employment and Skills

The Council will seek, in conjunction with the private sector and its regeneration partners, to secure the delivery of a minimum 4,600 new full-time equivalent (FTE) jobs in all sectors over the Core Strategy period focusing on the provision of new employment development as follows:

- a major new B1 / office employment centre as part of a wider mixed-use sustainable development of Ebbsfleet;
- office, industrial and warehousing facilities in the Swanscombe Peninsula and Northfleet Embankment Opportunity Area;
- office development in Gravesend Town Centre as well as retail, culture and leisure (see policy CS05);
- office, industrial and warehousing development in the Gravesend Riverside East and North East Gravesend Opportunity Area; and
- office and light industrial development in the form of an enterprise centre/incubation space on greenfield land South of Coldharbour Road, Northfleet.

17 For all practical purposes, the 500 metre zone at Ebbsfleet coincides with Northfleet Rise Quarter in Gravesham, which already benefits from outline planning permission for office uses as part of the wider mixed-use regeneration of the area.

18 For all practical purposes, the 500 metre zone at Ebbsfleet coincides with Northfleet Rise Quarter in Gravesham, which already benefits from outline planning permission for office uses as part of the wider mixed-use regeneration of the area.
New office development exceeding 2,500 sq.m floorspace, not included in the above, will be directed in the first instance to Gravesend Town Centre in accordance with the NPPF Sequential and Impact test. In applying this policy, the Town Centre Commercial Core (see Policy CS05 and the Policies Map) will be considered ‘in-centre’ and locations within 500 metres walking distance of Gravesend Station and Ebbsfleet Station (Dartford) will be treated as ‘edge-of-centre’.

In addition to the above, the Council will work with its partners to examine the potential of Swanscombe Peninsula East to deliver additional employment-led mixed-use development within the context of a masterplan approach having regard to identified constraints, accessibility, and environmental issues (as set out to policy CS03).

In considering development proposals, particular support will be given to schemes incorporating small and flexible industrial and/or office workspaces of high quality intended to support the start-up and expansion of small and medium sized enterprises (SMEs). The Council will also support the refurbishment and upgrading of existing industrial and commercial premises and improvements in information and communications technology to facilitate more flexible working practices.

Development resulting in the loss of B class employment floorspace will not be supported unless otherwise allowed for by policies set out in the Core Strategy19 or where:

- the proposal will deliver at least an equivalent number of new jobs on site or elsewhere within the borough; or
- the existing premises are no longer suited for employment purposes or are incapable of being made suitable at reasonable cost and it has been shown that there is no demand for them through an appropriate marketing exercise carried out in accordance with Council guidance; or
- the existing premises have an unacceptable environmental impact on the area within which they are situated and this is incapable of reasonable mitigation or the environmental benefit that would arise for the existing use stopping would outweigh the potential loss in employment.

Development proposals facilitating the expansion of river-related employment will be supported, particularly where these involve the use of the river for transport and/or provide specialist training or other facilities intended to support the continued use of the River Thames as a major commercial waterway.

The loss of existing commercial wharves and other land-side supporting infrastructure will not be supported unless it can be shown that they are:

- no longer suited for marine related employment purposes or are incapable of being made so at reasonable cost; and

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19 This includes the potential regeneration of some of the riverside sites at Northfleet Embankment and Gravesend Riverside where proposals for new mixed-use development may result in the loss of some existing employment space.
• it has been shown that there is no demand for them through an appropriate marketing exercise carried out in accordance with Council guidance.

Exceptions will be made to this policy where sites have been specifically identified to support other regeneration objectives and these are incompatible with the marine activity

The Council will support proposals that promote the appropriate expansion and diversification of the rural area economy. Support will be given to the conversion of rural buildings to employment use/live-work units subject to the constraints imposed by the Green Belt and other material considerations.

The Council will work with its regeneration partners to enhance opportunities for all local people to access the greater range of higher skilled jobs that will arise as a result of the policies above. Support will be given to upgrading educational and training facilities and major development projects will be expected to contribute (either directly or through other agencies) towards the delivery of skills training, the promotion of apprenticeships and work placements.

**Retail, Leisure and the Hierarchy of Centres**

A central component of sustainable development is the definition and reinforcement of a network and hierarchy of centres where people can access shops and a range of other uses often found in town centres by all types of transport. This means that all residents can have good access to shops and services, and make choices about how they travel, given the opportunities to walk, cycle or use public transport instead of the private car.

In conformity with the National Planning Policy Framework (NPPF), main town centre uses are defined as: retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities and the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs; nightclubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

**National planning policy and the approach toward main town centre uses**

This policy sets out the approach the Council will adopt in relation to retail, leisure, entertainment and the more intensive sport and recreation uses. Proposals involving offices, arts, cultural and tourism development are dealt with separately under policies CS07 on Economy, Employment and Skills and CS09 on Culture and tourism.

The NPPF states that planning policies should be positive and promote a competitive town centre lying at the heart of the local community. Policies should be pursued that support their vitality and viability, and an environment created that provides customer choice and a diverse retail offer whilst reflecting the individuality of the location. Existing markets should be enhanced to ensure that they remain attractive and competitive so as to add to the local offer. The need for retail, leisure, office and other main town centre uses over the plan period should be met in full and should not be compromised by
limited site availability. An assessment should be undertaken on the need to expand Town Centres to ensure a sufficient supply of suitable sites.

Beneath the town centre, the advice is to plan for the management and growth of a resilient network and hierarchy of local centres.

The NPPF requires that a sequential test be applied to planning applications for main town centre uses that are not in an existing centre and not in accordance with an ‘up-to-date Local Plan’. Local planning authorities should require applications for town centre uses to be located in town centres, then in edge-of-centre locations and only if suitable sites are not available should out-of-centre sites be considered.

Large developments (over 2,500 sq m) are required to undertake an impact assessment of their proposals on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal. In addition, the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, should be considered for up to five years from the time the application is made. This period is extended to ten years where the impact may not be realised during the shorter five year period.

The NPPF instructs local planning authorities to refuse planning applications that fail to satisfy the sequential test or are likely to have a significant adverse impact on one or more of the above factors.

The hierarchy and role of centres in Gravesham

In Gravesham, priority will be given to Gravesend Town Centre as the preferred location for investment in retail, leisure, entertainment facilities and the more intensive sport and recreation uses.

The focus on Gravesend Town Centre is set in the context of the sub-regional hierarchy of centres contained in the South East Plan (2009). This establishes the role of Chatham (also a centre for significant change) and Maidstone as Primary Regional Centres. Gravesend and Dartford are Secondary Regional Centres. Bluewater is treated separately as a specialist comparison Regional Shopping Centre, located out-of-centre and not forming part of the hierarchy of traditional town centres.

The Council’s approach to the planning of Gravesend Town Centre to ensure it develops as a multi-functional heritage riverside town is set out in Policy CS05 on the Gravesend Town Centre Opportunity Area. This follows the advice contained in the Gravesham Retail Study Update (2012) which recommends that the Council plan on the basis of improving its comparison retail offer as part of the mix of uses, focusing in particular on providing new larger scale units (250 – 500 sq.m) suitable to accommodate national multiple retailers of fashion goods. This is seen as part of a wider strategic approach that also supports the diversification of uses in the town centre; enhancing its cultural/leisure and service functions; strengthening the independent retail sector, as complementary to the offer of national multiples; and improving consumer choice in the offer of convenience goods.

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20 Convenience – insert definition as in glossary
The South East Plan reflects the existing outline planning permission for Ebbsfleet, in allowing for the creation of a new centre which provides supporting retail, leisure and service functions to meet the needs of the resident and daytime population. It remains unclear what form or scale this will ultimately take because the retail element will still be subject to impact assessment. On-going discussions with Dartford Borough Council and the developers will be needed to ensure that this new centre is delivered in a form compatible with both authorities' Local Plan policies and retail capacity, and will depend on the scale and nature of the development that actually occurs.

Local Centres, and the shops and services they provide, are essential for the community's ability to meet its day-to-day needs. The local centres below Gravesend Town Centre will be set out in the Site Allocations and Development Management Policies DPD. Expansion of these will be allowed at a scale commensurate with the role of the centre. The creation of new centres and expansion of others adjoining is allowed for under this policy where major new development is planned within the key sites set out in this Core Strategy.

The scale of retail and leisure development to be accommodated

The likely scale and form of retail and leisure development that may need to be accommodated over the Local Plan period has been considered through the Gravesham Retail and Commercial Leisure Study (2009); Gravesham Retail and Commercial Leisure Study Addendum (2010); and Gravesham Retail Study Update (2012). These retail floorspace projections have been further modified to ensure consistency of approach with planned development in the adjoining areas of Dartford and Medway. The resulting figures are set out below, with an explanation on their derivation contained in the Retail and Commercial Leisure Background Paper.

Table 5 - Summary of quantitative retail need

<table>
<thead>
<tr>
<th></th>
<th>2028</th>
</tr>
</thead>
<tbody>
<tr>
<td>Comparison goods - net sq.m</td>
<td>16,660</td>
</tr>
<tr>
<td>Comparison goods - gross sq.m</td>
<td>22,210</td>
</tr>
<tr>
<td>Convenience goods - net sq.m</td>
<td>1,620</td>
</tr>
<tr>
<td>Convenience goods –gross sq.m</td>
<td>2,180</td>
</tr>
<tr>
<td>Total – net sq.m</td>
<td>18,280</td>
</tr>
<tr>
<td>Total – gross sq.m</td>
<td>24,390</td>
</tr>
</tbody>
</table>

Source: Retail and Commercial Leisure Background Paper

Whilst these figures are likely to be subject to change over the Local Plan period, they should not be taken as imposing a ceiling on the maximum amount of retail floorspace that can be built. The planning system does not exist to constrain growth, competition or consumer choice, rather to promote sustainable development through the application of the NPPF sequential approach and impact testing. The actual phasing and delivery of retail floorspace will therefore be subject to market demand and detailed justification at the time of application, where qualitative as well as quantitative factors may be material considerations.

Following the recommendations of the Gravesham Retail Study Update (2012), no separate allowance has been made for retail warehouse type development. Any such proposals will need to be assessed on a case-by-case basis, with the presumption that comparison retail should be accommodated in line with general policy unless it can be demonstrated that it is not possible to sell the intended range of goods in a normal 'High
Street’ format. Where the case is made for retail in the ‘warehouse’ format and no sequentially preferable site is available in accordance with the policy set out below, the Council’s preferred option is that such development should be directed to the Imperial Retail Park or sites immediately adjoining where linked trips to the town centre can be facilitated.

Whilst the Gravesham Retail and Commercial Leisure Study (2009) also considers the potential for attracting new commercial leisure development, the lack of an industry standard approach to identify future needs makes it difficult to recommend levels or forms of provision. Growth in leisure expenditure over the plan period may mean that there is scope for new facilities such as a new cinema; new branded/family restaurants and cafes, in large well located modern units; and new health and fitness facilities.

However, the existing outline planning permissions for Ebbsfleet and Eastern Quarry include over 40,000 gross sq.m commercial leisure floorspace and this is likely to compete directly with any new facilities provided in Gravesend Town Centre. Whilst the proposals for Heritage Quarter may include provision for branded/family type restaurants, the absence of current market interest in cinema or other commercial leisure provision (other than the proposed upgrading of projection facilities at Woodville Halls to allow films to be shown) precludes the allocation of sites for such uses at this stage. See also policy CS09 Culture and Tourism.

Indicative distribution of new retail and leisure development

As noted above, priority will be given to Gravesend Town Centre as the preferred location for investment in retail, leisure, entertainment facilities and the more intensive sport and recreation uses. Additional retail provision will also be made to serve new and expanded residential and employment areas in new and designated local centres. No allowance at this stage has been made for other increases in floorspace in local centres designed to meet local needs, although the policy set out below allows for this where it is appropriate to the scale and function of the centre.

New retail development will be directed to the existing primary shopping area in line with the sequential approach. However as illustrated by the Retail and Commercial Leisure Background Paper, it is likely that insufficient sites will be available within the existing primary shopping area to accommodate the total need for retail development. Within Gravesend Town Centre itself, the Heritage Quarter key site is considered to be the Council’s sequentially preferred location for new larger scale comparison retail provision. Therefore this policy facilitates the expansion of the primary shopping area to allow additional retail development in the Heritage Quarter key site, subject to the tests set out in this policy and the NPPF. The comparison retail element will be focused on Heritage Quarter West and a mix of retail and other uses (including branded/family restaurants) in Heritage Quarter East. Retail development that creates a coherent expansion of the primary shopping area in this location will help to maintain and enhance the town’s role with the borough and wider area by planning positively over the longer term to meet the need for new retail floorspace.

Further allowances are made in Table X below for retail development to be accommodated within the town centre on sites with existing planning permission or other sites suitable for such uses. These include the Lord Street/Parrock Street open air car park sites, which lie partially within the Town Centre and are both edge-of-centre for the
purposes of applying the NPPF sequential approach. An allowance has also been made in the calculation for the coming back into use of existing vacant retail floorspace as this would also need to be supported by available spend.

The remaining identified capacity for retail development includes other sites with planning permission in opportunity areas outside of the town centre, where it is intended to create or expand existing local centres. The figures used here are based on assumptions regarding the comparison/convenience goods mix and the ratio of retail to other permitted uses. Further information on this is contained in the Retail and Commercial Leisure Background Paper.

It should be noted that the figures in Table X below are indicative and are only intended to show that sufficient sites are available to meet identified retail needs in full over the plan period and that this is not compromised by limited site availability. It will be for the market to determine whether such levels of provision are ultimately delivered.

Table 6 – Guideline distribution of retail development to meet full quantitative need over Local Plan period

<table>
<thead>
<tr>
<th>Area</th>
<th>Convenience Goods net sq.m</th>
<th>Comparison Goods net sq.m</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gravesend Town Centre Opportunity Area</td>
<td>-</td>
<td>15,900</td>
</tr>
<tr>
<td>Ebbsfleet Valley Opportunity Area</td>
<td>1,690</td>
<td>1,120</td>
</tr>
<tr>
<td>Northfleet Embankment and Swanscombe Peninsula East Opportunity Area</td>
<td>400</td>
<td>-</td>
</tr>
<tr>
<td>Gravesend Riverside East and North East Gravesend Opportunity Area</td>
<td>300</td>
<td>-</td>
</tr>
<tr>
<td>Total</td>
<td>2,390</td>
<td>17,020</td>
</tr>
<tr>
<td>Combined Total</td>
<td>19,410</td>
<td></td>
</tr>
</tbody>
</table>

Source: Retail and Commercial Leisure Background Paper.

Because of the uncertainty regarding future requirements for leisure, entertainment facilities and the more intensive sport and recreation uses requiring a town centre site, no strategic site allocations have been included in this Local Plan. This may be revisited in the future Site Allocations and Development Management Policies DPD should further information become available at that stage.

Applying the NPPF Sequential and Impact Tests in Gravesham

The Town Centre Plan (figure X) below defines the Gravesend Town Centre Primary Shopping Area (PSA) and the Town Centre Commercial Core boundary (TCCC) on the basis of current uses and commercial activity. These, along with the Heritage Quarter Key Site boundary, are also shown on the Policies Map.

Policy CS08 below sets out how the NPPF Sequential and Impact Tests will be applied in Gravesham, prioritising the Primary Shopping Area as the sequentially preferred location for retail uses and the Town Centre (inclusive of the PSA) as the sequentially preferred location for leisure, entertainment facilities and the more intensive sport and recreation uses.

Unless otherwise allowed for under policy, proposals for such uses exceeding 2,500 sq.m floor area will be required to show that there are no reasonably available sites that are sequentially preferable and that any requirements in relation to impact testing are
met. This test is applicable to all main town centre uses including those in CS09 and CS07.

Map 7 – Town Centre Plan

Policies that make clear which uses will be permitted on the primary and secondary retail frontages within Gravesend Town Centre and the mix of those uses will be considered within the proposed Site Allocations and Development Management Policies DPD in due course. The network and hierarchy of local centres and their boundaries will also be subject to review at that stage.

Policy CS08: Retail, Leisure and the Hierarchy of Centres

The Borough Council will seek to reinforce a sustainable network and hierarchy of centres in Gravesham by maintaining the position of Gravesend Town Centre within the sub-regional hierarchy of centres and by protecting and enhancing local centres within Gravesham itself by:

a) Applying a sequential approach to the location of town centre uses;
b) Requiring an impact test to retail and leisure development not in accordance with the policies in this Core Strategy (see policy CS07 for office development)
c) Supporting development of a scale and intensity appropriate to the position of the centre in the hierarchy and to the character of the centre.
d) Safeguarding the retail character and function of centres by resisting development that would detract from their vitality and viability

e) Encouraging provision for a mix of units including opportunities for small shops and independent traders in all centres

**Town Centre**

Gravesend Town Centre will be maintained as the highest order centre within the borough and retail, leisure, entertainment facilities and the more intensive sport and recreation uses will, unless otherwise allowed for under this policy, be directed as follows:

- The Primary Shopping Area as shown on the Policies Map will be the sequentially preferred location for new retail development followed by edge-of-centre sites and then out-of-centre sites.
- The Town Centre boundary (inclusive of the Primary Shopping Area) as shown on the Policies Map will be the sequentially preferred location for leisure, entertainment facilities and the more intensive sport and recreation uses, followed by edge-of-centre sites and then out-of-centre sites.

In line with the above sequential approach, retail development will first be directed to the town centre’s existing primary shopping area (PSA). Retail development outside the primary shopping area at the Heritage Quarter key site will be supported where it can be demonstrated that:

1. It is part of a coherent expansion of the primary shopping area, linked to the existing primary shopping area by good / clear pedestrian links to facilitate circulation between New Road, the areas east and west of the High Street, and the riverfront.; and
2. There is a need for the development which is unlikely to be met within the existing primary shopping area. This will be subject to formal retail assessment in accordance with national policy at the time.

Where a case has been made for large format retail/commercial leisure development and no suitable sites can be identified following the application of the sequential approach set out above, the Borough Council will support development in or immediately adjacent and connected to the Imperial Retail Park as its preferred location for such development.

**Local centres**

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21 The Town Centre Plan (figure X above) defines the Primary Shopping Area (PSA) and the Town Centre Commercial Core (TCCC) on the basis of the current uses and commercial activity. For the purposes of the application of this policy, the following definitions will apply:

- **Edge-of-Centre**: For retail purposes, a location that is well connected and up to 300 metres walking distance of the Primary Shopping Area and, for leisure, entertainment facilities and the more intensive sport and recreation uses, a location within 300 metres walking distance of the Town Centre boundary.
- **Out-of-Centre**: A location which is not in or on the edge of a centre but not outside the urban area.
Development of additional retail floorspace will be supported within local centres, as defined on the Policies Map where it is designed to meet local needs and is of a scale appropriate to the centre.

Local shopping and service provision in smaller frontages or single shops away from the identified centres should be retained where it remains viable and provides an important service to the local community.

New centres and expansion of existing to serve new development

The creation of the new centres and expansion of existing centres listed below will be supported where they are of a scale and form designed to meet the need arising from associated planned new development.

• Ebbsfleet (Springhead Quarter)
• Ebbsfleet (Northfleet Rise Quarter)
• Northfleet Embankment West (as extension to The Hive)
• Northfleet Embankment East (as component of mixed-use development option)
• Gravesend Canal Basin (as part of mixed-use development)

Impact testing

Any proposal for retail, leisure, entertainment facilities and the more intensive sport and recreation uses involving floorspace in excess of 2,500 sq.m and located wholly or in part on and edge-of-centre or out-of-centre site shall be supported by a statement to establish compliance with the NPPF sequential approach and to show that the scheme would not (either on its own or in combination with other committed schemes) have a significant adverse impact on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal or on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, for a period of five or ten years from the time the application is made, as appropriate.

Relationship to future work to enable delivery

To support this policy, the following will be shown on the Policies Map:

• primary and secondary frontages, and
• Primary Shopping Area for Gravesend Town Centre, and
• Gravesend Town Centre Boundary.

The Site Allocations & Development Management Policies DPD, once produced, will:

• identify boundaries for the other centres in the hierarchy and review the centres (inc. adding centres such as Milton Road).
• Include criteria-based policies to guide decisions regarding the appropriate balance of uses within Gravesend Town Centre and the other centres in the hierarchy.

Until that time, saved policies as set out in appendix XX will apply
**Culture and Tourism**

Cultural facilities provide for the pursuit of leisure, recreation, sport, arts and music activities and include a range of uses that add greater diversity to the cultural scene. Tourist facilities fulfil a similar role and are intended to attract both day trippers and staying tourists to the Borough. Cultural and tourism facilities include museums, theatres, cinemas, restaurants, historic sites, parks and tourist accommodation (e.g. hotels, bed and breakfast accommodation). Such facilities are important to the health and wellbeing of the Borough’s residents and visitors. They also make a significant contribution to the local economy.

This policy sets out the approach the Council will adopt in relation to arts, cultural and tourism development. Retail, leisure, entertainment and the more intensive sport and recreation uses are dealt with separately under policy CS08 Retail, Leisure and the Hierarchy of Centres and offices under CS07 on Economy, Employment and Skills.

Gravesham Borough has a number of cultural and tourism assets including ones relating to:
- Heritage, e.g. Gad’s Hill Place, Chantry Heritage Centre, Cobham Hall & Park
- Defence heritage, e.g. Woodlands Cold War Bunker, New Tavern Fort
- River, e.g. Town Pier and pontoon
- Rural recreation, e.g. Shorne Woods Country Park, Jeskyns, Cyclopark
- Entertainment, e.g. Woodville Theatre.

The Borough further benefits from having a unique setting on the Thames Riverside as well as access to the scenic countryside and historic villages of the Kent Downs. Easy access facilitated by high speed train services and the close proximity of Ebbsfleet International Station also has the potential to increase the number of visitors to the Borough.

The National Planning Policy Framework (NPPF) recognises the importance of cultural well-being to providing strong, vibrant and healthy communities. It also states that people’s quality of life can be positively improved by improving the conditions in which people take leisure. The NPPF requires the planning system to deliver sufficient community and cultural facilities and services to meet local needs. It also seeks to support sustainable rural tourism that benefits rural businesses, communities and visitors, and which respects the character of the countryside. This includes support for the provision and expansion of tourist and visitor facilities in appropriate locations where needed.

The NPPF includes arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities) amongst main town centre uses. This means that the sequential test should be applied as set out under Policy CS08 Retail, Leisure and the Hierarchy of Centres.

The Council seeks to increase the contribution of tourism to the local economy and to encourage a vibrant environment within which the arts, culture and the Borough’s
heritage can flourish.\textsuperscript{22} This is reflected in the Tourism Strategy for Gravesham. This Strategy recognises the need to promote the Borough’s qualities, assets and visitor attractions. It also seeks to maximise opportunities for expanding the visitor economy as a result of regeneration and growth in the area. It further seeks an improvement in the quality and an expansion of visitor accommodation in the Borough through:

- new hotel development with proximity to the town centre and riverside or close to the A2;
- encouraging new bed and breakfast start-ups; and
- investigating the expansion of other forms of visitor accommodation.

The Tourism Strategy indicates the potential for cruise liner provision to help bring visitors into the Borough and this is supported through policy CS11 Transport.

Furthermore, the Council’s draft Cultural Strategy 2008 sets out to:

- ensure an appropriate range and distribution of high quality cultural and leisure facilities across the Borough; and
- make the area more attractive to incomers and also as a tourist destination.

The evidence suggests that there is scope for new branded/family restaurants and cafes and a new cinema, either a small multiplex or an arthouse/independent cinema, in Gravesend town centre and at Ebbsfleet.\textsuperscript{23} It also suggests that there is a case for providing a combined Gravesham Museum and Visitor Centre, ideally in the heart of Gravesend town centre.\textsuperscript{24} In terms of hotels, studies indicate that Gravesham could experience a significant increase in demand for hotel accommodation. This could be met by new 3 or 4 star hotels at Ebbsfleet and by new budget and 3 star hotels in Gravesend, particularly in the town centre and close to the A2/arterial routes.\textsuperscript{25} Hotels are defined as a main town centre use in the NPPF. Town centre locations will be favoured for new hotels in order to promote their vitality and viability whilst recognising that market demand will influence hotel location. Proposals to develop a hotel outside a designated centre will need to carry out a thorough sequential test to ensure there are no suitable sites in line with Policy CS08.

Clearly there are opportunities to improve Gravesham’s cultural and tourism offer. The Core Strategy seeks to protect existing cultural and tourist facilities and to enable the provision of new and enhanced facilities to serve the needs of the Borough’s residents and visitors and to maximise opportunities for expanding the visitor economy. New smaller scale facilities below the sequential test threshold, such as the conversion of a single dwelling to bed and breakfast tourist accommodation, will be supported in other locations where they will not have adverse local impacts, for example in terms of residential amenity and traffic generation. Other policies in the Core Strategy, in particular Policies CS12 Green Infrastructure, CS13 Green Space, Sport and Recreation and CS20 Heritage and the Historic Environment, seek to protect and enhance the Borough’s important assets which make it attractive to residents and visitors.

It is important to safeguard existing tourist facilities and all types of tourist accommodation as well as provide new premises. Policy CS09 will protect all existing

\textsuperscript{22} Gravesham Borough Council Corporate Business Plan 2011-2015
\textsuperscript{23} Retail and Commercial Leisure Study 2009
\textsuperscript{24} A Museum for Gravesham – Feasibility Study 2010
\textsuperscript{25} Gravesend Hotel Market Fact File 2011 and Kent Thameside Hotel Futures Study 2007
tourist facilities and accommodation that are fit for purpose. However, the council recognises the need for flexibility in order to respond to an evolving tourist and day visitor market.

**Policy CS09: Culture and Tourism**

The Council will maximise the opportunities for expansion in culture and tourism derived from its heritage and green infrastructure assets and from regeneration and growth in the area, including greater use of the river, high speed train services, Ebbsfleet and Bluewater. In particular, the Council will:

- seek to protect and support improvements to existing cultural and tourist facilities;
- support the provision of new cultural and tourist facilities appropriate to their location and accessibility; and
- support sustainable rural tourism and leisure developments that benefit rural businesses, communities and visitors, and which respect the character of the countryside and the function of the Green Belt (see CS02).

Regard will be needed to the sequential test in Policy CS08 Main Town Centre Type Uses and the Hierarchy of Centres

**Physical and Social Infrastructure**

It is important that sufficient infrastructure is provided to meet the needs of existing and new residents, employees and businesses within the Borough. Facilities such as GP surgeries, schools and libraries play an important role in providing for the health, welfare, social, educational and spiritual needs of the community. Such facilities can add vibrancy to communities, provide a focus for activities, foster community spirit and contribute to the quality of life for many residents. They can also provide an essential service to communities. The loss of such facilities can have adverse consequences in terms of accessibility to services locally, and can lead to unsustainable travel patterns. It is also important to address existing deficiencies in services. At the same time, planning for infrastructure is being carried out when there are uncertainties over future service delivery models and future funding decisions by national government.

This section specifically deals with physical and social infrastructure. The policy requirements in relation to Green Infrastructure and Green Space, Sport and Recreation are dealt with under Core Policies CS12 and CS13.

Gravesham Borough has benefited from significant investment in infrastructure in recent years. It has a relatively new police station and community hospital as well as a walk-in health centre. Four of its eight secondary schools received Building Schools for the Future funding which meant that their premises could be refurbished or rebuilt. North West Kent College was redeveloped to provide better facilities. Implementation of the Fastrack Bus Rapid Transport system began and aims to provide a high quality, attractive public transport system linking major existing and new developments. Residents, employees and businesses also now benefit from the introduction of High
Speed 1 train services from Gravesend to London and from Ebbsfleet to London and the continent. This front-loading of infrastructure has provided capacity for growth in the area.

The provision of infrastructure is recognised as an important part of new development in the National Planning Policy Framework (NPPF). It requires local planning authorities to work with other authorities and providers to assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands. It states that Local Plans should identify priority areas for infrastructure provision and should plan positively for the infrastructure required. This needs to be realistic, taking into account development costs and viability.

The Council has identified requirements for infrastructure over the plan period to support the delivery of the Core Strategy. This has been achieved by engaging with service providers and consulting their plans where relevant, e.g. NHS West Kent Estates Strategy and Strategic Service Development Plan 2010, and the Draft Commissioning Plan for Education Provision in Kent 2012. An Infrastructure Delivery Schedule has been produced which sets out these requirements. It shows how infrastructure will be funded, who will provide the infrastructure and when it will be provided. It is a ‘living’ document which will be kept under review and updated when new information becomes available. An improvement to the A2 Ebbsfleet junction is essential to the delivery of development at Ebbsfleet and Eastern Quarry, developments which will take place across both Gravesham and Dartford Boroughs and not explicitly as a result of development in Gravesham. A range of other infrastructure such as primary schools and health facilities will also be required to ensure that new and existing developments are properly integrated and that new residents will have access to essential services.

The Council has previously identified the need for more burial space in the Borough, possibly through the provision of a new site. This Core Strategy does not identify a site for this but the Council will work with service providers to find a suitable site for potential allocation in the Site Allocations and Development Management Policies DPD, taking into account the policies in this Core Strategy.

Development viability modelling work has been carried out for the various housing markets in Gravesham. This shows that there are development viability issues in the areas of the Borough proposed for development, particularly regeneration sites in the Gravesend / Northfleet urban area. The viability of development largely depends on: the amount of remedial work which needs to be carried out; the density of development; and the amount of affordable housing sought. Development viability will be taken into account when setting out the infrastructure required from new developments.

Section 106 of the Town and Country Planning Act 1990 allows local authorities to enter into a legally binding agreement, or planning obligation, with a person with an interest in the land in order to make a development acceptable before planning permission is granted. These agreements are increasingly used to support the provision of services

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26 Future Requirements in Relation to Cremation and Burial Facilities Draft Report December 2009
27 Affordable Housing Viability Study February 2010
and infrastructure where developments create additional demands for infrastructure, such as transportation, education, health and affordable housing (see policy CS16 for affordable housing requirements). They must be:

• necessary to make the development acceptable in planning terms;
• directly related to the development; and
• fairly and reasonably related in scale and kind to the development.

The Government has introduced regulations which allow local planning authorities to charge developers a Community Infrastructure Levy (CIL). This is standard, locally set charge which is intended to provide infrastructure to support the development of an area. Its purpose is to provide greater transparency and certainty to developers about the amount of money they will be expected to contribute. There will still be a role for planning obligations to be used for site specific mitigation measures.

The Council’s strategy is to seek the retention of existing facilities wherever possible. It will also work in partnership with infrastructure providers to address existing deficits in provision. This may be achieved through making better use of existing facilities. To ensure that infrastructure is provided to meet the needs arising from new development, the Council will require developers to provide or make contributions towards the timely provision of infrastructure taking into account the viability of development. This will be achieved through consultation with service providers and negotiations with developers on a site by site basis. It will also be achieved through the introduction of CIL.

**Policy CS10: Physical and Social Infrastructure**

Support will be given to proposals and activities that protect, retain or enhance existing physical and social infrastructure, or lead to the provision of additional infrastructure that improves community well-being. Where there is the threat of loss of existing infrastructure, consideration will be given to whether sufficient alternative provision is available.

Where new development leads to the need for new or improved physical or social infrastructure, developers will be required to provide or contribute towards this subject to viability considerations. Such infrastructure will be put in place in a timely manner to support new development. All new development should make the most efficient use of new and existing infrastructure.

**Transport**

Transport policy is a means to of achieving the overall regeneration and development objectives set out in the Core Strategy and the delivery of a sustainable pattern and form of development that assists in combating climate change. The challenge is to meet the additional transport requirements as a result of new development in the Borough and to address existing transport issues whilst remaining an attractive and accessible place to
live, work and visit and to do business. Despite this, it is recognised that as a result of natural growth in traffic and new development congestion will increase.

The National Planning Policy Framework (NPPF) requires local planning authorities to support a pattern of development which facilitates the use of sustainable modes of transport, i.e. public transport, walking and cycling. Developments that generate significant movement should be located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. Such proposals should be supported by a Transport Assessment and a Travel Plan. The NPPF further advises local planning authorities to identify and protect sites and routes which could be critical in developing infrastructure to widen transport choice.

Policy CS02 on the Distribution of Development sets out the broad location of future development in the Borough over the plan period. The Core Strategy seeks to:
- locate new mixed use development in areas with best access to services and facilities which minimise the need to travel, particularly by car.
- improve the local economy to reduce the need for out-commuting. This can also have an impact on air quality.
- support and where possible provide alternatives to help support a modal shift away from car based transport, e.g. improve public transport including bus, train, cycling and walking provision, and the increased use of water based transport; and
- ameliorate the implications of additional traffic for air quality.

Policy CS10 relating to Physical and Social Infrastructure sets out the general approach to infrastructure and outlines the requirement for development to provide or contribute towards infrastructure to meet the needs arising from new development. The Infrastructure Delivery Schedule sets out the requirements for infrastructure over the plan period to support the delivery of the Core Strategy including transport schemes.

In Gravesham, Kent County Council is the transport authority and the Highways Agency is responsible for the A2/M2 trunk road. The Local Transport Plan for Kent 2011-16 sets out Kent County Council’s Strategy and Implementation Plans for local transport investment. This document was informed by the draft Kent Thameside Transport Strategy Technical Summary Report 2008. It should be noted that it was produced at a time when Gravesham was planning to meet the South East Plan growth scenario rather than its own housing and employment needs as is now proposed.

The Urban Baseline Study prepared for Gravesham Borough Council in 2010 evaluated opportunities and constraints at Gravesend and Northfleet riverside, Gravesend town centre, Ebbsfleet and Northfleet. In terms of access, it found that:
- Gravesend and Northfleet riverside is a major asset but the riverside walk is currently discontinuous and there is poor accessibility at some key access points;
- Ebbsfleet station surroundings have low legibility and poor spatial accessibility;

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• Ebbsfleet and Gravesend are well connected by Fastrack and trains but the route has poor environmental quality for pedestrians and cyclists;
• Northfleet station has close proximity to Ebbsfleet station but is currently hidden from the main roads;
• the routes from Northfleet towards Ebbsfleet station are dominated by vehicular traffic and have poor legibility, environmental conditions and accessibility; and
• the routes towards the riverside are hindered by large industrial blocks with inactive frontages.

The above documents are referred to where relevant in the sections below.

**Transport Hubs**

The Council considers that Gravesend town centre provides an existing transport hub of Borough wide significance. It is the main destination for bus services operating in the Borough, has conventional and high speed train services to London and provides car parking for those wishing to access the shops and services in the town. Currently, bus services serve different locations in the town centre and some stops are poorly related to the railway station. There are plans for an integrated transport interchange at Garrick Street/Barrack Row which would involve the provision of a bus interchange immediately adjoining the railway station. This is supported through Policy CS05 on Gravesend Town Centre.

The South East Plan identifies Ebbsfleet as having the opportunity to create a new transport hub of regional significance based around the international rail station and its associated development. This hub could be developed by giving priority to measures that increase the level of accessibility by public transport, walking and cycling and to the development of high quality interchange facilities between all modes of transport.

**Walking and Cycling**

It is important to ensure that walking and cycling is the first choice of transport for people for short journeys in the Borough for functional (e.g. work, school) and leisure purposes as they are the most sustainable forms of transport. This helps to reduce congestion and improve air quality. It also makes a significant contribution to the health and wellbeing of the Borough’s residents, workers and visitors.

Policy CS12 on Green Infrastructure seeks to create, protect and enhance a multifunctional linked network of green spaces, footpaths, cycle routes and wildlife stepping stones and corridors, i.e. a green grid. The network will seek to improve access within the urban area, from the urban area to the rural area and along the River Thames for leisure and sustainable travel purposes. This includes support for a Thames Estuary Path for walkers and cyclists.

There is an aspiration for a dedicated pedestrian link between Northfleet and Ebbsfleet stations to allow connections to be made between traditional rail services and high speed and international rail services. The Urban Baseline Study recommends the provision of pedestrian-oriented and active urban connections between these stations.

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30 Local Transport Plan for Kent 2011-16 and Kent Route Utilisation Strategy 2010
The Council supports this as it would have the additional benefit of providing improved links between existing communities at Northfleet and the new communities at Ebbsfleet. It would also enhance the Ebbsfleet transport hub.

Opportunities will be taken to improve walking and cycling facilities and networks throughout the Borough. These should aim to provide access to the Gravesend town centre and Ebbsfleet transport hubs and to other facilities such as local centres, parks and schools. Where appropriate, developments will be expected to make appropriate provision towards these.

**Bus, Train and Coach Transport**

There is a frequent and extensive bus network serving the urban area. The developing Fastrack Bus Rapid Transport system forms part of this. It provides a high quality attractive public transport linking Gravesend town centre with Ebbsfleet, Bluewater and Dartford. The bus service in the rural area is less extensive though there are regular services along the A226 towards the Medway Towns and the A227 towards Borough Green and Sevenoaks. Limited development in the rural area is unlikely to provide a catalyst for improved bus services serving this part of the Borough.

The Council seeks to facilitate and encourage further use of public transport. Therefore it will work with Kent County Council, other partners and transport operators to enhance the bus network. This will include maintaining segregation lanes and bus priority measures for Fastrack and other bus services. The Council will also require developers of the key sites to provide links to the bus network, including the provision of routes through the sites where appropriate. The requirements are outlined in the Opportunity Area policies.

There are good train links to London from five stations on two classic lines in the Borough. Services from Gravesend have recently been improved by the introduction of high speed train services which use the high speed line. There are also direct links to the continent from nearby Ebbsfleet International Station.

The Kent Route Utilisation Strategy (2010) produced by Network Rail sets out future plans for the railway network in the Borough. This indicates that there is heavy loading on peak hour trains to London as a result of commuter demand in Kent. Further investment is committed with a remodelled station at Gravesend and platform extensions at Gravesend and Northfleet stations to accommodate 12-car trains by 2014.

Crossrail is a cross-London rail connection. In 2017, this will give access from Heathrow and Maidenhead in the west to Abbey Wood (which lies on the traditional railway line between Gravesend and London) in the east. There is the possibility of the future extension of Crossrail from Abbey Wood to Gravesend to help address future peak capacity issues. The Policies Map shows the land which is safeguarded for this, including facilities at Hoo Junction.

The Council will support proposals to improve train services and facilities in the Borough, including the extension of Crossrail to Gravesend.

There is a significant level of commuting to London by coach from the Borough, although these services are vulnerable to traffic congestion particularly in London.
currently use routes which go through the urban and rural areas and this network reduces the need for car journeys to access these services.

**Freight and River Transport**

The Draft Freight Action Plan for Kent 2012-16 indicates that Kent County Council supports the expansion of the rail freight industry and particularly the transfer of freight from road to rail. It also supports the transfer of freight from road to waterways. Transportation of freight by water and rail has a number of advantages over transportation of freight by road including reducing carbon, noise pollution and congestion. The reinstatement of the rail freight sidings at Northfleet and heavy rail connection from the North Kent line into the Northfleet Cement Works Regeneration Area (see section on Swanscombe Peninsula and Northfleet Embankment Opportunity Area) indicates that there are opportunities for providing multi-modal alternatives to road transport for the movement of freight in the Borough. The Borough Council supports the transfer of freight from roads to waterways and railways.

Gravesham’s location on the River Thames means that river transport has historically been important. There are a number of deep water wharves on the riverside at Gravesend and Northfleet. The emerging Kent Minerals and Waste Development Plan proposes that a number of strategic wharves in Gravesham are safeguarded, protecting them from development which could prejudice their future use for minerals importation. There are also a number of smaller wharves in the Borough. The safeguarding of wharves is supported by the Borough Council in general terms to enable river freight handling and to reduce dependence on road and rail freight transport. However, the Borough Council considers that a more flexible approach to Red Lion Wharf is required to enable the key regeneration objectives for Northfleet Embankment East to be achieved. The policy on Swanscombe Peninsula and Northfleet Embankment Opportunity Area gives priority to the regeneration of Northfleet Embankment East over the existing use.

Gravesend’s Town Pier has been restored and a pontoon has recently been installed. The regular passenger ferry service across the river from Gravesend to Tilbury now operates from the new pontoon. It is recognised that there may be opportunities to further develop river based transport to provide longer distance passenger services to the Docklands and central London and to provide greater opportunities for leisure trips. The Council will support such proposals.

The Council’s Tourism Strategy (2009) indicates that there is potential for cruise liner provision on the Gravesham stretch of the Thames to help bring visitors into the area which would further improve the local economy. The Council will support provision for cruise liners in the Borough.

**Road Transport**

The Borough has benefitted from recent investment in a number of road schemes. This includes the realignment and widening of the A2 to 4 lanes, the opening of the Ebbsfleet A2 junction and link road, and changes to the one way system in Gravesend Town Centre as the first phase of implementing the integrated transport interchange. Despite this, parts of the Borough experience traffic congestion particularly during morning and evening peak period as a result of commuter based traffic. This is especially the case in
the urban area and along the A2. Gravesend town centre experiences congestion on weekdays and on Saturdays associated with retail and other business activities. The resulting exhaust emissions have led to poor air quality in some areas which has led to the declaration of a number of Air Quality Management Areas, e.g. one way system in Gravesend town centre, A2, some of the junctions on Old Road East/West. The County Council is planning to expand its Urban Traffic Management and Control system to cover Gravesend town centre. This will help to maximise the efficiency of the local highway network and create smoother traffic flows. It should reduce traffic pollution in the relevant Air Quality Management Areas but this may be balanced by traffic growth.

The Highways Agency has concerns about the impact of development in the Borough and Dartford on the strategic road network and how any impacts will be mitigated. The Borough Council will work jointly with the Highways Agency, Kent County Council, Dartford Borough Council and all other relevant parties to ensure that the transport needs arising from new development in the Borough are met (see Policy CS10 Physical and Social Infrastructure) and that the most efficient use is made of the existing highway network, e.g. through management measures and the introduction of information systems.

The Dartford Crossing is one of the UK’s most important strategic connections but its capacity is considerably overloaded for large periods for the day. A study carried out on behalf of the Department for Transport has identified three longer term options to provide additional capacity and further work is being carried out on these. Kent County Council make it clear that they support the option of a new Lower Thames Crossing to the East of Gravesend. Gravesham Borough Council does not support a Lower Thames Crossing in Gravesham and has resolved that such an alignment is not acceptable on environmental grounds. Until such time as there is a safeguarded route, it is not possible for the Core Strategy to take any account of the implications of additional capacity.

**Impact of Development on the Transport Network**

A Kent Thameside multi-modal transport model has been used to assess the impact of development proposed in Dartford and Gravesham. The model runs have shown that, even when a number of committed and funded transport schemes are taken into account, and despite generally good public transport provision, the level of development planned in the Boroughs would significantly affect the operation of the highway network. In response, a package of strategic transport infrastructure improvements at key locations was identified to enable the development to be realised whilst maintaining an acceptable level of performance across the transport network – the Strategic Transport Investment Package (STIP). These are listed in the Local Transport Plan and are subject to regular review.

Additional technical work using the development quantities proposed in this plan and the adopted Dartford Core Strategy to 2028 have shown that trips on the highway network will increase significantly, as will usage of the public transport network. The STIP

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32 Local Transport Plan for Kent 2011-2016
package schemes noted above make a contribution towards reducing junction capacity issues but that there are also a number of other junctions within the Gravesend/Northfleet urban area that will potentially have problems. Some of these may be addressed as a by-product of development, some will be so constrained by built development that a major scheme will not be possible, and for others schemes will need to be developed. Traffic management measures, including Urban Traffic Management and control (UTMC), will help maximise the use of the highway network.

The Ebbsfleet junction on the A2 forms part of the STIP list, however the modelling suggests that further technical work may be required at the Tollgate A2 junction (A227). Public transport provision is to be enhanced by the Transport Quarter proposals and works to Northfleet and Gravesend Rail Stations that are already committed to by Network Rail. Fastrack and other bus services will need, so far as possible, bus priority measures to ensure they can offer a fast and reliable service despite highway traffic congestion. Existing bus routes may need amending or new ones developed to serve the key sites as well as existing urban areas to encourage mode shift. The A227 Wrotham Road corridor is an example where improved provision is needed. Walking and cycling networks need to be expanded and made more coherent. The location and amount of car parking in Gravesend Town Centre, taking account of proposed developed, needs to be examined and optimised. The Infrastructure Delivery Plan contains the current list of and status of identified schemes. Flows on the transport network will need to be monitored and schemes modified or developed as circumstances evolve as development occurs.

**Transport Assessments, Travel Plans and Car Parking**

Transport Assessments describe the overall impact of developments on the local transport network, and consider their accessibility by all modes of transport, taking into account any highway or sustainable access improvements that developers propose to implement. The contents of a Transport Assessment will depend on the size, nature and location of a development.

Travel Plans are aimed at promoting sustainable transport options for sites and reducing car dependence and single car occupancy. They can reduce reliance on the private car by promoting the opportunities for travelling to and from sites by public transport, walking or cycling and by offering new opportunities to reduce car use, for example through the establishment of car sharing services or car clubs.

The Council will require applicable new developments to prepare and adopt Transport Assessments and Travel Plans using Kent County Council’s guidance “Transport Assessments and Travel Plans, October 2008.” It will also require developments to take into account current car parking standards. These will be refined taking into account the availability of alternative means of transport and accessibility to services and facilities.

Currently, the Council uses the Kent Vehicle Parking Standards which it adopted in July 2006 as Supplementary Guidance. This recognises that the control of parking at new developments is one way of promoting more sustainable forms of transport. It also recognises that parking takes up a large amount of space and has a direct influence on the efficiency of land use, the density of development achieved and its cost. The Parking Standards document states that the parking provision determined for a
development should follow an assessment of the travel options by all modes of transport that are already available or that can be provided.

Increased traffic as a result of new development can have a significant impact on air quality and on amenity. There is guidance on how developers should assess air quality and mitigate air quality impacts arising as a result of their development proposals. The Council will use this guidance to consider when planning applications will require an air quality assessment.

**Policy CS11: Transport**

New developments will provide, as appropriate, and implement transport assessments and travel plans to ensure the delivery of travel choice and sustainable opportunities for travel. Sufficient parking in new development will be provided in accordance with adopted parking standards which will reflect the availability of alternative means of transport and accessibility to services and facilities.

The Council will support proposals which improve public transport provision and facilities in the Borough. In particular, it will:

- seek to maintain segregation lanes for Fastrack and existing bus priority measures elsewhere;
- require key sites to include provision for bus stops (on or off-site) and bus priority measures as appropriate; and
- support the development of transport hubs at Gravesend Town Centre and Ebbsfleet (in Dartford Borough Council area) to provide high quality interchange facilities between bus, rail, walking and cycling.

The Council will seek improvements to walking and cycling facilities and networks in the Borough including through provision in new development as appropriate. These should provide improved access to Gravesend Town Centre and Ebbsfleet and to other services and facilities in the Borough. In particular, the Council will seek the provision of high quality, dedicated pedestrian and cycle links between Northfleet and Ebbsfleet stations and along the River Thames.

Land required for the possible future extension of Crossrail is safeguarded on the Policies Map and proposals that would prejudice this would be refused.

The Council will support proposals which improve the efficiency of freight transport and provide opportunities for alternatives to road transport where possible. The Council will safeguard wharves except where this would be detrimental to achieving the key regeneration objectives of the key sites on the riverside.

The Council will support proposals which facilitate the use of the River Thames for passenger transport and enable cruise liners to visit the Borough.

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33 Kent and Medway Air Quality Partnership Air Quality and Planning Technical Guidance July 2011
Green Infrastructure, Sport and Recreation

Green infrastructure is defined by the National Planning Policy Framework as a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. Green infrastructure, sport and recreation facilities enrich the quality of life for residents and visitors in the Borough. They have a vital role to play in encouraging and enabling active and healthy lifestyles. Green infrastructure is also important for protecting and increasing biodiversity, protecting the landscape and providing improved access for leisure and sustainable travel purposes.

The NPPF seeks to:
- protect existing open space, sport and recreational land and buildings and ensure that developments include green space;
- protect and enhance public rights of way and access;
- conserve and achieve a net gain in biodiversity, including planning for biodiversity at a landscape-scale and identifying local ecological networks;
- protect and enhance public rights of way and access; and
- conserve the landscape and scenic beauty of Areas of Outstanding Natural Beauty as well as protect and enhance valued landscapes.

It states that Local Plans should contain a clear strategy for enhancing the natural environment and supporting Nature Improvement Areas. It further outlines that policies should distinguish between the hierarchy of sites so that protection reflects their status and importance.

Green Infrastructure

This section addresses Gravesham’s multi-functional green space network and its green grid, together with wider biodiversity and landscape resources which are considered to form the green infrastructure network of the Borough.

Green Spaces

Gravesham has a number of strategic green spaces and some of these have come about as a result of previous major investments in the Borough, e.g. Jeskyns Community Woodland, and the Cyclopark. The Borough also has a number of more local green spaces such as Windmill Hill and Northfleet Urban Country Park. All green spaces contribute towards the green infrastructure network. Further information on levels of provision and our approach towards them is given in the Green Space, Sport and Recreation section below.

Green Grid

There has been a long term aspiration to develop a linked network of open spaces and routes across the Borough, joining with a wider network beyond the Borough’s
boundaries. This is known as the green grid. The focus of the green grid in Gravesham is on building a network that:

- Links green spaces to create green continuity, including ecological continuity, wherever possible
- Improves access within the urban area, from the urban area to the rural area and along the River Thames for leisure and sustainable travel purposes
- Creates safe and attractive routes for walkers, cyclists and mobility-impaired people

The network includes: public highways, public rights of way and cycle routes, with their associated verges and planting; waterways with their associated bank-sides and verges; railway and road embankments; and green roofs and walls. Ultimately, the green grid aims to become a well used, safe and attractive network of green links carrying a variety of non-vehicular paths and ecological corridors through the urban area, and connecting up with local and long distance riverside and countryside trails.

There is a long standing desire to develop a Thames Estuary Path to provide a continuous route for walkers and cyclists from the Thames Barrier in London to the Isle of Sheppey in Kent which the Council supports. Natural England is also implementing a Coastal Access Scheme which seeks to create and improve pedestrian access along the coast. Work has started on this scheme in Kent. The Urban Baseline Study recognises the importance of providing open access to the riverside in new developments and creating a continuous riverwalk from Canal Basin to Swanscombe Peninsula. This is supported through both the Green Infrastructure and Transport policies.

There is also an aspiration for a dedicated pedestrian link between Northfleet and Ebbsfleet stations. If implemented, such a link would provide part of the Green Infrastructure network but is considered in more detail under Policy CS11 Transport.

**Biodiversity**

Gravesham Borough has a significant biodiversity resource. This includes:

- Sites of international and national significance for wildlife, e.g. Thames Estuary and Marshes Special Protection Area and Ramsar Site, North Downs Woodlands Special Area of Conservation, and Cobham Woods Site of Special Scientific Interest. Internationally significant sites are all designated as Sites of Special Scientific Interest and so are protected by national legislation.
- Species protected by European and/or national legislation, e.g. bats, great crested newts
- Local wildlife sites which are important for the conservation of wildlife at the county level, e.g. Ebbsfleet Marshes, Court Wood Shorne
- Roadside nature reserves, e.g. A226 Gravesend Road, Chalk
- Priority habitats and species identified in the UK Biodiversity Action Plan, e.g. native woodland including ancient woodland, lowland calcareous (chalk) grassland

Some previously-developed sites in the urban area have high biodiversity value. The green space and green grid networks together with other areas such as school grounds and private gardens also have a role in providing and connecting habitats.

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34 Thames Estuary Path Survey 2008
Recent evidence suggests that there has been a decline in bird populations in the internationally significant Thames Estuary and Marshes Ramsar/Special Protection Area sites. There is currently insufficient evidence to adequately assess the cause of this decline although interim findings indicate that recreational activity causes disturbance to birds. Further work is being carried out in relation to this matter and a precautionary approach to development will be applied. This means that developers will be expected to provide sufficient alternatives for the recreation needs arising from their developments and implement other measures, which may include contributions to visitor control mechanisms and management of the SPA, to ensure that detrimental impacts on the integrity of the SPA/Ramsar site are avoided.

The Greater Thames Marshes has recently been declared a Nature Improvement Area (NIA). This recognises that it has a unique yet fractured landscape and significant biodiversity importance but that the biodiversity is in decline and struggling to compete with increasing pressures. The NIA seeks to protect and enhance this valuable habitat and increase numbers of endangered species and protect existing flora and fauna. In Gravesend, the NIA includes the River Thames and much of the marshland to the east of Gravesend.

Local Nature Partnerships have recently been set up to help local areas to manage the natural environment as a system and to embed its value in local decisions for the benefit of nature, people and the economy. Local Nature Partnerships have recently been approved for Kent and Thames Gateway.

The strategy is to ensure that there is no net loss of biodiversity in the Borough and to take every opportunity to improve biodiversity. Existing sites of biodiversity value will be protected according to their importance. In addition, development will be expected to be designed, laid out and constructed in a manner which protects habitats and important species and also includes features to enhance biodiversity. Biodiversity Opportunity Areas have been identified across Kent and the wider South East which incorporate areas of the greatest biodiversity value. In Gravesend, these comprise: North Kent Marshes; Thames-side Green Corridors; and Medway Gap and North Kent Downs. These areas give opportunities for the restoration or creation of new priority habitats and will be the focus for improvement where opportunities arise, for example through the Local Nature Partnerships and the Nature Improvement Area.

**Landscape**

Gravesend has a diverse rural landscape, from the marshes around the Thames in the north; arable farmlands to the south and east of Gravesend; and downs and woodland in the south. Part of the nationally important landscape of the Kent Downs Area of Outstanding Natural Beauty (AONB) is located on the eastern side of the Borough and it extends from Shorne south to Vigo. It is designated because of its scarp slope and dry valleys which often retain a downland character and its woodlands are also highly valued. Great weight should be given to protecting the landscape and natural beauty of the AONB. The Kent Downs AONB Management Plan has been adopted by the Borough Council. It sets out clear aims, policies and actions for the conservation, management and enhancement of the AONB to 2014 and a longer term vision.
A Landscape Character Assessment for the urban fringes and rural area of Gravesham has been produced. This sets out 11 local landscape character areas. For each area, there is an assessment of condition and sensitivity and guidelines for appropriate actions to protect and enhance the landscape. In addition, it contains generic guidelines for different types of landscape and development. This will be used to inform future decisions on proposals affecting the urban fringes and rural area.

Greening the Gateway Kent and Medway has produced a number of landscape studies called Cluster Studies which seek to identify areas that could be enhanced for the benefit of communities while at the same time increasing and protecting natural habitats and wildlife. Those in Gravesham cover:

- Ebbsfleet Valley and A2 Corridor
- Thames and Medway Canal
- Shorne to Shore

In its Thames Gateway Delivery Plan in 2007, the Government committed to a Parklands programme. This aimed to regenerate and develop urban and rural open spaces which are connected together to create an accessible and coherent landscape. The Cluster Studies influenced the funding received under this programme. This funding led to the creation or enhancement of a number of parks and green spaces in North Kent. In Gravesham, this included Cyclopark, the restoration of part of the Thames and Medway Canal and the enhancement of the Riverside Leisure Area. The Shorne to Shore Cluster Study is more recent and covers the countryside to the east of Gravesend as far as the built up area of Medway. It seeks to protect vulnerable areas and enhance biodiversity, while also offering opportunities to increase access to the countryside, boost the local economy and raise the profile of the area.

Landscape features such as trees and hedgerows within the urban area are also important as they help to raise the quality of the environment and the quality of people’s lives, as well as providing stepping stones and habitats for wildlife. Therefore, it is important that such landscape features within the urban area are retained and enhanced.

The Council’s strategy is to conserve and enhance the landscape character and valued landscapes of the Borough, giving greatest weight to protecting the Kent Downs Area of Outstanding Natural Beauty. Proposals affecting the urban fringe and rural area will be expected to take into account landscape character. All developments will be expected to protect and enhance landscape features as part of Gravesham’s green infrastructure network.

**Green Infrastructure Network**

The strategic green infrastructure network for the Borough is identified on the map below. This shows: existing and proposed long distance walking and cycling routes; movement corridors; and biodiversity opportunity areas. The latter includes: major green spaces, e.g. Shorne Wood Country Park, Jeskyns; strategic green grid corridors, e.g. Cyclopark; and most of the Kent Downs AONB nationally important landscape falling within Gravesham Borough.
It should be noted that all green spaces, the green grid, biodiversity resources, and landscape features contribute towards the Borough’s green infrastructure network. The strategy is to protect and enhance this network.
Policy CS12: Green Infrastructure

A multifunctional linked network of green spaces, footpaths, cycle routes and wildlife stepping stones and corridors will be created, protected, enhanced and maintained. The network will improve access within the urban area, from the urban area to the rural area and along the River Thames. The key parts of the network are identified on the Strategic Green Infrastructure Network map.

Sites designated for their biodiversity value will be protected, with the highest level of protection given to internationally designated Special Protection Areas, Special Areas of Conservation and Ramsar sites, followed by nationally designated Sites of Special Scientific Interest, followed by Local Wildlife Sites and then by other areas of more local importance for biodiversity.

There will be no net loss of biodiversity in the Borough, and opportunities to enhance, restore, re-create and maintain habitats will be sought, in particular within the Biodiversity Opportunity Areas shown on the Strategic Green Infrastructure Network map and within new development.

Where a negative impact on protected or priority habitats/species cannot be avoided on development sites and where the importance of the development is considered to outweigh the biodiversity impact, compensatory provision will be required either elsewhere on the site or off-site, including measures for ongoing maintenance.

The overall landscape character and valued landscapes will be conserved, restored and enhanced. The greatest weight will be given to protecting the landscape and natural beauty of the Kent Downs Area of Outstanding Natural Beauty. Proposals will take account of the Kent Downs Area of Outstanding Natural Beauty Management Plan, the Gravesham Landscape Character Assessment, and the Shorne to Shore Cluster Study where relevant.

Green Space, Sport and Recreation

This section addresses provision and standards for green space, indoor and outdoor sport and recreation provision in the Borough.

In Gravesham, green spaces include parks, green corridors, natural greenspace and children's play areas. Facilities such Woodlands Park and Camer Country Park provide opportunities for informal recreation. Gravesham also has a range of formal indoor and outdoor sports facilities. Cascades Leisure Centre in Gravesend and Cygnet Leisure Centre in Northfleet provide a range of facilities including swimming pools, sports halls and health and fitness facilities. Meopham has a fitness and tennis centre. There are also sports pitches, golf courses, bowling greens and a number of other sports facilities provided by the public and private sector which provide the Borough’s residents and workers with the opportunity to take part in sport. Some playing pitches have a dual function and also provide green space, e.g. Culverstone Recreation Ground.
A study of Gravesham’s Open Space, Sport and Recreation facilities has been completed. This found that the overall amount of all types of green space in the Borough is sufficient for the needs of the existing population. However, the provision of green space and access to it varies across the Borough. For example, there are issues with the provision of children’s play areas, natural greenspace and allotments in much of the urban area and with access to parks in East Gravesend. It found that improvements to the quality of all types of green space are required.

In terms of playing pitches, the study found that the overall amount of playing pitch land in the Borough is sufficient to meet the needs of the existing population. However, whilst there is an overall surplus of adult football pitches, there are shortfalls of junior football pitches and mini-soccer pitches (significant shortfall). Quality improvements are needed, particularly in terms of changing room facilities and disabled access at various sites. There are issues of access to and/or capacity of playing pitches. This is particularly an issue for mini-soccer pitches in Northfleet, East Gravesend and the rural area and for cricket, junior football and rugby pitches in much of the urban area.

The study found that there are sufficient amounts of some sports facilities to meet the needs of the current population, e.g. swimming pools, sports halls. However, more health and fitness facilities are needed to meet the needs of the existing population. There is a need for some quality improvements to some facilities, e.g. multi-use games areas, indoor tennis courts. There are issues of access to and/or capacity of sports facilities in some locations, for example health and fitness facilities in Central and South Gravesend and outdoor tennis courts in much of Gravesend and Northfleet.

There is a clear need to address existing deficiencies identified in the Gravesham Open Space, Sport and Recreation Study as well as needs arising from new development. The natural growth in the Borough’s population over the plan period, the Council’s priority to encourage people to increase their level of physical activity and the ageing population will affect the amounts and types of playing pitches and sports facilities needed in the Borough in the future. The Council will work to address these needs through setting standards and considering site allocations in the Site Allocations and Development Management Policies Development Plan Document. The Council’s strategy is to protect existing green space, playing pitch and other sports facilities, and make good existing deficiencies and make provision to meet future demands.

**Policy CS13: Green Space, Sport and Recreation**

The Borough Council will seek to make adequate provision for and to protect and enhance the quantity, quality and accessibility of green space, playing pitches and other sports facilities, in accordance with the findings of the Gravesham Open Space, Sport and Recreation (PPG17) Study.

A set of consistent green space, playing pitch and sports provision standards will be established which will apply to all new development. Provision should be made on site. However, where this is not possible, alternative provision or the enhancement of existing facilities will be required off-site. In all cases, provision will include arrangements for the ongoing maintenance of the space.

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35 Gravesham PPG17 – Open Space, Sport and Recreation Study 2010
Residential Development

Housing is about much more than ensuring everyone has a roof over their heads. A safe and secure place to call home gives people a strong foundation for every aspect of their lives. Historically, the vast majority of people have aspired to owning their own home and rising prosperity and easily available finance over the past decade has helped many people onto the housing ladder.

In recent years the housing market has experienced significant challenges as a result of turbulence in financial markets. This has resulted in house prices falling, fewer mortgage products, people having financial difficulties and a difficult business environment with a reduction in the number of houses being built. Despite this, the underlying long-term trends remain, with clear housing demands from potential first time buyers, growing families and the elderly.

The National Planning Policy Framework (NPPF) requires local planning authorities to ensure that their local plan meets the full needs for market and affordable housing in their area, including identifying key sites which are critical to the delivery of the housing strategy over the plan period. This includes a mix of housing based upon current and future demographic trends, market trends and the needs of different groups in the community such as families with children, older people and people with a disability. It also includes identifying the size, type, tenure and range of housing that is required in particular locations and setting policies for meeting affordable housing need.

In rural areas, the NPPF requires planning authorities to plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Rural exception sites are defined as small sites used for affordable housing in perpetuity where sites would not normally be used for housing. The NPPF further states that the construction of buildings in the Green Belt is inappropriate but it does make an exception for limited infilling in villages and for limited affordable housing for local community needs under policies in the local plan.

Housing Type and Size

Different households require different types and sizes of housing. It is important that the Core Strategy plans for the provision of an appropriate choice and mix of housing across the Borough in order to create balanced and sustainable communities. Widening housing choice broadens the appeal of an area and assists in meeting the needs of existing residents as well as attracting new residents to the Borough. Ensuring that new housing takes account of local need and existing provision is essential.

The Strategic Housing Market Assessment (SHMA) found that in both affordable and market housing, there is both overcrowding and under-occupation. It states that many households will be unable to move to more suitable housing either because of affordability or lack of supply. The Core Strategy seeks to ensure that an adequate amount of new housing to meet local housing needs (policy CS02) and affordable
housing (policy CS16) is provided to provide for future needs. However, the size and type of housing provided is also important.

The SHMA Update indicates that there is a need for a mix of house sizes for both market and affordable housing. For market housing, it shows a significant need for 3 bedroom (47%) and 2 bedroom (31%) properties. For affordable housing, which comprises social and intermediate housing, it shows that the greatest need is for 1 bedroom properties (37%) but it also shows significant needs for 2 bedrooms (32%) and 3 bedroom (28%) properties.

Whilst new housing can provide different sizes of units, the existing housing stock also has a significant role to play in ensuring that a mix of housing is provided. The SHMA recommends that the conversion of family homes (taken to be 2 and 3 bedroom homes) into smaller units should be restricted so that new families have more choice within the market and, by doing so, will improve the flow of smaller homes onto the market that they vacate.

There will be a growth in the older population in the Borough over the plan period. This will be associated with an increase in the numbers of those who have difficulties completing household tasks and self-care activities. There will also be an increase in those with a limiting long-term illness. As a result, the SHMA recommends that the building of market housing particularly suited to the needs of older households and other special needs groups should be encouraged. This includes meeting lifetime homes design standards and requiring some housing to be built to wheelchair standard. It also includes encouraging the provision of specialist and extra care housing. It is important that housing to meet the needs of older people is provided in accessible locations close to services. It could also help to meet the future requirement for family homes as a result of older households downsizing.

As a result of the above, the Council’s strategy is to plan for a mix of house sizes and types that will be appropriate to the differing needs of the community. It will protect existing family sized housing (2 and 3 bedroom homes) to ensure that a sufficient number of larger units are maintained. The Council will also seek to ensure that more homes are built which are designed to meet the longer term needs of older and disabled people as well as support the provision of specialist housing to meet such needs.

**Policy CS14: Housing Type and Size**

The Council will expect new housing development to provide a range of dwelling types and sizes taking into account the existing character of the area and evidence of local need to create sustainable and balanced communities.

The Council will resist the conversion of family sized residential units to smaller properties.

The Council will seek the provision of an increased proportion of housing designed to the lifetime homes standard with some housing to be built to

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36 Ref to Lifetime Homes standard
wheelchair standard to meet the needs of older people and people with disabilities.

Sheltered housing and extra care housing for people with special needs will be supported on suitable sites in areas close to a range of services that provide for the needs of future occupants.

**Housing Density**

The demand for additional homes by 2028, the finite amount of previously developed land and the competing demand for uses put increasing pressure on land and require innovative approaches to help deliver high quality housing. Density can affect the development value and the Affordable Housing Viability Study (2010) considered a range of densities.

The density of housing can have an effect on local character and distinctiveness. The Council wishes to ensure that land is used efficiently but this needs to be balanced with delivering the right type of housing to meet the needs of the whole community in the right location.

It is important that the densities sought do not affect the quality and character of an area and the general well-being of residents. The appropriate density will be design-led and will have regard to the accessibility of each site. Therefore appropriate densities will vary across the borough. Higher densities will be sought in Gravesend town centre due to the fact that it is a Borough wide transport hub with good access to public transport. Lower density housing will be sought in the suburbs and rural area. Density is measured by the number of dwellings per hectare.

High density does not always mean high rise development, and high density schemes can provide good quality attractive housing, including family provision through a range of built forms.

**Policy CS15: Housing Density**

Sites will be developed at a variety of densities, depending on their location and accessibility to public transport. The form and density of housing will vary across the larger sites, in response to accessibility and other characteristics of each part of the site. Variations in density across a site should be used to develop different character areas.

All new housing will be developed at a density that is consistent with achieving good design and does not compromise the distinctive character of the area in which it is situated. Subject to this overriding consideration:

- Within the urban areas of Gravesend, Northfleet and Ebbsfleet, new residential development will be expected to achieve a minimum density of 40 dwellings per hectare. In suitable locations close to the transport nodes of Gravesend Town Centre and Ebbsfleet higher densities will be encouraged.
• Within Gravesend town centre, as defined under policy CS05, new residential development will be expected to achieve a minimum density of 75 dwellings per hectare.

• In other locations not listed above, new residential development will be expected to achieve a minimum density of 30 dwellings per hectare.

Development proposals that fail to make efficient use of land for housing, having regard to the character and location of the area, may be refused permission.

**Affordable Housing**

Affordable housing is defined as housing with sale prices or rent levels which are set substantially lower than the prevailing market price or rent, so that it will be accessible to local people in priority housing need, whose incomes are insufficient to enable them to afford housing on the open market. It includes social rented, affordable rented and intermediate housing (see glossary for definitions). Affordable housing should remain at an affordable price for future eligible households.

The SHMA update indicates that Gravesham has a significant need for affordable housing (52%). The Council needs to be realistic when setting its targets about what can be delivered. Given this, different affordable housing targets for the different Gravesham sub-markets were tested in the Affordable Housing Viability Study. This recommended that the Council should introduce separate targets for the proportion of affordable housing to be included in housing developments, based on the differing residual land values of urban and rural sites. It considered a 30% target for the urban area and a 35% target for the rural area to be appropriate for achieving the maximum delivery of affordable housing.

The Study also concluded that a smaller threshold for the delivery of affordable housing in the rural area would be justified as a substantial majority of all new dwellings would be developed on sites of less than five dwellings. Consequently, the Council has decided to retain what was then the national threshold of 15 dwellings or more on sites of 0.5 hectares or more in the urban area and a locally derived threshold of 3 dwellings or more on sites of 0.1 hectare or more within the rural area. The Council will seek an affordable housing mix of 70% affordable and social rented and 30% intermediate. It represents a balance between the desire to maximise the provision of affordable and social rented accommodation for those in greatest need, with the desire for balanced communities and recognition of viability considerations.

Affordable housing will be provided on-site unless both the Council and the applicant agree that it would be preferable for provision to be made on an alternative site or a financial contribution were to be made for development to take place elsewhere.

The SHMA indicates that while rural areas are typically wealthier than urban areas, they will still contain many households who still face acute housing needs. This is best addressed through local housing needs surveys. Rural Housing Needs Surveys are being undertaken in the Borough on an on-going basis to identify the specific affordable housing needs of the rural parishes and settlements. It is recognised that it might not be
possible to fully deliver the scale of affordable housing identified in these surveys in the rural settlements which are inset from the Green Belt. Consequently, some of the local need for affordable housing might need to be met within the Green Belt. The NPPF states that limited affordable housing for local community needs under policies set out in the Local Plan is not inappropriate in the Green Belt. Cross subsidy or other mechanisms to deliver market housing in the Green Belt will not be acceptable under this policy.

It is not appropriate to quantify a particular number of dwellings that will be considered to be "limited" for affordable housing in the Green Belt as this will primarily depend on the level of local community need identified together with the following:

- The size and character of the built up area of the individual settlement concerned, and its position in the settlement hierarchy;
- The fact that this will be a solely affordable housing site may also limit the size of the site to ensure mixed communities and this may mean that the development of 2 or more sites might be preferable to one large site.
- The type of affordable housing being proposed, such as extra-care, where the viability of a scheme may depend upon its scale.

It is considered that affordable housing in the Green Belt should be provided in a sustainable location. The accessibility of the site to services and facilities and the position of the settlement in the settlement hierarchy will be used to assess this. Consideration will also be given to the impact of proposals on the built and natural environment under policies X Development and Design Principles and X Green Infrastructure.

Proposals for affordable housing development in the Green Belt will need to ensure that they are restricted to households who are either current residents of the parish or have an existing family or employment connection.

**Policy CS16: Affordable Housing**

The provision of affordable housing will be required on all new private housing developments of: 15 dwellings or more or on sites of 0.5 hectares or more in the urban area; and 3 units or more or on sites of 0.1 hectares or more in the rural area.

The amount of affordable housing to be provided by private housing development sites above the threshold will be 30% in the urban area and 35% in the rural area.

The Council will seek an affordable housing mix of 70% affordable rented and social rented accommodation and 30% intermediate housing.

Development will be subject to site viability and the mix of units necessary to meet local needs and achieve a successful sustainable and socially inclusive development.

In the Green Belt, limited affordable housing in a sustainable location for a proven and justified local community need will be supported. Such units once...
constructed will be occupied by people with a proven local community connection. This includes affordable rural workers dwellings. In all cases, permissions granted under this policy will be restricted to those uses in perpetuity.

Provision of Traveller Sites

The Council is responsible for assessing the housing needs of and allocating land to meet the needs of all sections of the local community including Gypsies, Travellers and Travelling Showpeople. This policy sets out a fair and effective approach to addressing the accommodation needs of this section of the community and provides a basis for determining planning applications on unallocated sites.

For the purposes of this policy, Gypsies, Travellers and Travelling Showpeople will be referred to as Travellers. It is recognised that the needs of Gypsies and Travellers and Travelling Showpeople vary. The policy will apply to those members of the Travelling community who meet the definitions set out in Annex A of the “Planning Policy for Traveller Sites” (March 2012).

National policy recognises that Travellers have the same rights and responsibilities as other citizens and supports their traditional travelling way of life. It requires needs assessments to be carried out to establish unmet need and requires sites to be provided to address this. In addressing site provision, sites should be sustainably located. The location should be appropriate for residential use and provide access to local services and facilities to promote social inclusion. New sites are inappropriate in the Green Belt and should not be permitted in areas with high risk of flooding, i.e. flood zone 3. Where unmet need is being addressed, proposals that do not accord with planning policies can be refused.

In January 2012 there were 8 Gypsy and Traveller sites in the Borough providing pitches for 25 households. There is a publicly owned site at Denton, Gravesend, which has 8 pitches. The remaining 7 sites are a mix of pitches with permanent and temporary planning permission. There are currently no transit sites or plots for Travelling Showpeople in the Borough. There are an unknown number of Gypsies and Travellers accommodated in houses.

Gravesham’s current evidence base identifies a need to provide an additional 15 pitches in the Borough between the period 2006 – 2011. This need has been partially addressed through the provision of 8 new pitches on a new site at Springhead Road Northfleet. No need has been identified for plots for Travelling Showpeople during this period.

The Council is updating its assessment of need for the Plan period using a common methodology with adjoining local authorities. The revised target, including any backlog in provision as necessary, will be included in a future Development Plan Document (DPD). This assessment of need is expected to be completed in 2013. Updated needs assessments will be carried out on a regular basis over the Plan period.

37 North Kent Gypsy and Traveller Accommodation Assessment 2006 and North and West Kent Travelling Showpersons Accommodation 2007
In line with national policy, the Council proposes to work with neighbouring planning authorities to allocate sufficient sites to meet the needs identified in the updated assessment. This will widen opportunities and provide flexibility for new site provision. It will also assist in focusing transit site provision in areas of greatest need.

The Council will safeguard the supply of permanent Traveller sites. Opportunities to expand and or increase the density of existing permanent sites within the urban area will be investigated. If necessary, the Council will seek to make provision for new sites within the urban area and rural settlements inset from the Green Belt.

In advance of the Site Allocations and Development Management Policies DPD and the new Traveller Accommodation Assessment, planning applications for windfall sites will be considered against the provision of the NPPF and the “Planning Policy for Traveller Sites”.

**Policy CS17: Provision of Traveller Sites**

The Council will seek to meet the housing needs of Travellers in the Borough by:

1. Safeguarding traveller sites with permanent planning permission for their current use unless it can be demonstrated that they are no longer needed to meet identified need;

2. Working with neighbouring planning authorities to identify sufficient sites for Travellers to meet the need identified in the most up to date needs assessment;

3. Investigating opportunities to extend existing permanent sites within the urban area; and

4. Supporting new sites within the urban area and rural settlements inset from the Green Belt which accord with policies in this plan in particular those relating to Development and Design Principles, Climate Change, Green Infrastructure, and Heritage and the Historic Environment

**Climate Change**

**Introduction**

Climate change is expected to lead to hotter, drier summers and wetter, warmer winters with increased storm and flood events. Human activity has the potential to have a profound impact on both the scale and rate of that change. The NPPF recognises the role that planning can have in supporting the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and by encouraging the reuse of existing resources and the use of renewable resources. As a result, it requires Local Plans to take account of climate change over the longer term, including factors such as flood risk, coastal change and water supply.
The Council has signed up to the Nottingham Declaration which is a voluntary pledge by local authorities to recognise and address climate change as a key priority. It is a public commitment to lead and encourage others at a local level and it recognises the social, economic and environmental benefits of action against climate change. It commits signatory authorities to develop an action plan on mitigating the causes of climate change and on adapting to the effects of climate change. This is going to be replaced with Climate Local, a mechanism by which councils can express commitments to climate change both locally and nationally, as well as seek support for climate change objectives.

In view of its commitment to the Nottingham Declaration, the Council’s Corporate Plan includes a pledge to work with partners to mitigate and adapt to the effects of climate change on the Borough and pro-actively reduce the impact the council and its operations, its residents and its businesses have on climate change.

The following sections address the climate change issues of: flood risk; sustainable drainage; water demand management; carbon reduction; and coastal zone management. These are areas of expected change because of technological advancements and further research. Changes to national standards are also occurring in some cases. The Council is seeking to achieve an effective and deliverable approach to these issues in light of these changes.

**Flood Risk**

Parts of the Borough are at risk from flooding. The main concern is the risk of tidal flooding from North Sea storm surges which would affect the River Thames. Most of the areas alongside the river have a high standard of protection by defences. However, a risk of flooding still exists in these areas because of the possibility of defence failure or over-topping during extreme events. The risk posed by flooding from other sources (fluvial, pluvial, surface water and groundwater) also needs to be taken into account.

The NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. It advises that Local Plans should be supported by a Strategic Flood Risk Assessment and should take account of advice from the Environment Agency.

In light of the above, the NPPF requires the application of a sequential test which steers new development to areas with the lowest probability of flooding. It recognises that it may not be possible for development to be located in zones with a lower probability of flooding if it is to meet wider sustainability objectives. In such cases, it allows an exception test to be applied. For the exception test to be passed, it must be demonstrated that:

- the development provides wider sustainability benefits to the community that outweigh flood risk; and
- the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

The NPPF further states that land that is required for current and future flood management should be safeguarded from development. It also advises Local Plans to
use opportunities offered by new development to reduce the causes and impacts of flooding.

The Thames Estuary 2100 (TE2100) project aims to develop a long term tidal flood risk management plan for London and the Thames Estuary. The proposed TE2100 Flood Risk Management Plan shows that there are unlikely to be major changes to the existing system of defences over the plan period. However, it is likely that there will be changes in the longer term. All the options include a new flood defence to the north east of Gravesend and some of the options include a new Thames flood barrier, either at Long Reach, Dartford, or between Gravesend and Tilbury. This needs to be taken into account in the Council’s approach.

A Strategic Flood Risk Assessment (SFRA) was carried out for Kent Thameside (Dartford and Gravesham Boroughs) in 2005 and updated in 2009. This showed the different zones of flood risk in the Borough, particularly for potential development sites, to inform the application of the sequential and exceptions tests. It also made a series of recommendations including:

- New developments should ensure, through appropriate mitigation measures, that flood damage is limited in order to remove the risk of loss of life
- New developments should be “future proofed” against uncertainty and local flood risk assessments will help address this
- When the opportunity arises, flood gates should be replaced with solid defences and the provision of new gates to enable access to the foreshore should be discouraged
- New developments should provide and maintain flood management infrastructure

Most of the Borough’s Opportunity Areas, and the key sites within them, are in areas at risk of tidal flooding along the River Thames. These areas have been identified for development required in order to achieve the long-standing strategy of regenerating Gravesham by the concentration of development on previously developed land. As a result, some sites identified along the Thames Riverside do not comply with the sequential approach. Therefore, these will need to meet the exceptions test set out in the NPPF which means that they will need design solutions that provide a safe environment for those living and working there. Other sites which come forward in the Borough will need to meet the sequential test. In order to assess whether the sequential and exceptions tests are met, proposals for development in flood risk areas will need to be accompanied by a Flood Risk Assessment and a Flood Risk Management Plan.

Given the risk of tidal flooding in Gravesham, the future changes which may come about as a result of the TE2100 project and the recommendations of the SFRA, the Council will seek to prioritise the maintenance, improvement or replacement of flood defence infrastructure over other land uses.

**Sustainable Drainage and Surface Water Run-Off**

Whilst waste water capacity is primarily an infrastructure issue, climate change will have an impact on the waste water system due to increased winter rainfall and storm events. This means that combined sewers and other surface water drainage will have to deal with increased flows. Therefore, it is important that such impacts are mitigated through the introduction of Sustainable Drainage Systems (SUDS). In addition to reducing flood
risk, SUDS have a number of other benefits such as enhancing water quality, providing a sympathetic environmental setting for development and providing a wildlife habitat.

The Kent Thameside Water Cycle Study recommends that for larger sites, or where there will be several developments in one area, a Sustainable Drainage Systems “management train” (a series of progressively larger-scale practices to manage run-off) approach should be adopted. Subsequent to the above study being undertaken, a new system was introduced under the Flood and Water Management Act 2010. This effectively prioritises SUDS over conventional drainage designs.

The practical application of the new system under the 2010 Act has yet to be determined. Therefore, the Council’s approach is to ensure that surface water run-off from new development has no greater adverse impact than the existing use and to support SUDS as the preferred drainage solution where it is feasible to do so.

**Water Demand Management**

Gravesham is one of the driest areas in the South East, a region which has very low levels of rainfall overall. Evidence was produced to support the planned levels of housing and employment growth required by the South East Plan\(^{38}\). This showed that water supply was not a constraint on that level of development. This position has since been confirmed through Southern Water’s and Thames Water’s Water Resource Management Plans which cover the period to 2034 and the findings of the Kent Thameside Water Cycle Study. In view of this, it is assumed that the lower rates of growth now intended in Gravesham are also manageable.

There is still a need to manage demand for water in an area which is water-stressed. As a result, the Water Cycle Study recommended that:

- All new homes should be built to level 3/4 of the Code for Sustainable Homes in terms of water use (105 litres per person per day consumption)
- A small percentage of new homes, e.g. 5%, should be built to level 5/6 of the Code for Sustainable Homes in terms of water use, possibly as exemplars (80 litres per person per day consumption)
- Retro-fitting be promoted, where it is cost effective, to offset a proportion of the demand from new development
- New non-household developments should meet the BRE Environmental Assessment Method (BREEAM) ‘excellent’ rating for water efficiency, and the collection of rainwater should be implemented

The Council’s strategy is to minimise water use by requiring new developments, to meet the suggested standards for water efficiency in new developments. Within existing housing stock and where it is not possible to meet the above standards on development sites, the Council will support retrofitting of water efficiency measures within existing residential properties.

**Carbon Reduction**

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\(^{38}\) South East Plan Technical Note 4 Water and Growth in the South East March 2006
The Core Strategy seeks to reduce greenhouse gas emissions through the appropriate location and design of future development in the Borough. The NPPF requires local planning authorities to support energy efficiency improvements to existing buildings and to take into account the Government’s zero carbon buildings policy and national standards when setting local requirements for building sustainability. The aim is to move towards zero carbon development and to reduce the overall carbon footprint of the Borough.

To help increase the use and supply of renewable and low carbon energy, the NPPF states that local planning authorities should:

- Have a positive strategy to promote energy from renewable and low carbon sources
- Design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily
- Consider identifying suitable areas for renewable and low carbon energy sources
- Identify opportunities where development can draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers

The Code for Sustainable Homes is the national standard for the sustainable design and construction of new homes. It aims to reduce carbon emissions and is intended to help promote higher standards of sustainable design above current Building Regulations minima. It uses a one to six star rating system, with six being the most sustainable. The Code is not mandatory and there is no plan to make it mandatory but it can be required where local authorities stipulate a requirement in their Local Plans.

BREEAM sets the standard for best practice in sustainable building design, construction and operation. It is more commonly used for assessing non-domestic buildings.

The Government is moving towards introducing zero carbon standards from 2016 for all new homes and from 2019 for all new non-domestic buildings. Zero carbon will be achieved through: fabric energy efficiency which will require that new homes are sufficiently well insulated and adequately air tight; carbon compliance (the overall on-site contribution to zero carbon) which includes on-site low and zero carbon heat and power, e.g. solar panel electricity systems; and allowable solutions which are methods to deal with the remaining emissions to meet zero carbon standards, e.g. investment in off-site renewable electricity. The zero carbon standards will be implemented through changes to the Building Regulations and the regulatory framework is still being developed, so local standards are not being proposed.

An Eco Assessment for Kent Thameside was completed in 2010 to understand the potential for renewable and low carbon energy in the area and to identify how this could be realised. This made the following key points:

- Consideration should be given to the renewable and low carbon heat potential of the key sites and the town centre
- It highlights the opportunities where stand-alone low carbon and renewable energy technologies might be exploited, e.g. wind energy
- There is the opportunity for a Kent Thameside microgeneration initiative to promote the installation of small scale renewable energy technology. Particular reference is made to the opportunity to create a biomass hub at Northfleet Embankment East as part of development proposals
• It recommends that local standards exceeding or introduced in advance of changes to the Building Regulations would not be appropriate and a Supplementary Planning Document on sustainable design and construction to facilitate the transition to zero carbon homes / buildings should be produced instead

In relation to the final point, the Sustainability Appraisal recommended that the policy should include BREEAM and Code for Sustainable Homes targets, as well as water demand management.

The evidence shows that the key sites and the town centre have potential for incorporating renewable and low carbon technology. As a result, the Council’s strategy is to require the key sites to consider the potential and include proposals for low carbon and renewable energy generation, including combined heat and power. This should be justified by the submission of evidence.

The Council also supports proposals for stand-alone decentralised, renewable or low carbon energy development. The pressure for such development is likely to be in the rural area of the Borough and these developments can have an impact on landscape character, particularly in the nationally important Kent Downs Area of Outstanding Natural Beauty. As a result, proposals will need to take into account other policies in this plan, in particular the need to maintain the openness of the Green Belt and the policy relating to Green Infrastructure.

The Eco Assessment has identified the potential for a specific microgeneration initiative at Northfleet Embankment East. It is considered that the scale and mix of development proposed elsewhere may also provide opportunities. This is particularly the case where the development sites adjoin those in Dartford Borough or where development sites are close to existing residential or commercial areas that can be integrated into a wider network. The Council intends to support the roll out of the national “Green Deal” initiative as an appropriate alternative to the microgeneration initiative. This can be targeted towards areas and groups where wider carbon reduction and fuel poverty objectives can be achieved in a cost effective way. This will be taken forward through the Council’s corporate approach to climate change.

The introduction of local standards for reducing the carbon footprint of new buildings in advance of changes to the Building Regulations is not recommended in the Eco Assessment but the Sustainability Appraisal contradicts this advice. As outlined above, there are uncertainties about the forthcoming regulatory framework to achieve zero carbon standards and the issues are complex. In view of this, the Council is not seeking to introduce local standards.

The Council recognises that there may be other opportunities to reduce the carbon footprint of the Borough. It also includes potential initiatives such as the creation of a Community Energy Fund whereby contributions from developers towards allowable solutions could be used for carbon reducing initiatives in the Borough. Such initiatives include retrofitting existing homes. The Council will support such initiatives.

The section above deals with operational carbon rather than embodied carbon. Embodied carbon refers to the carbon emissions created by the production of the building up to the point it comes into use. Operational carbon refers to carbon emissions resulting from the use of the building. Embodied carbon is not currently included in the
national definition of zero carbon. As such, it is inappropriate for this Core Strategy to include policy requirements for embodied carbon but this may be revisited through the Site Allocations and Development Management Policies DPD.

**Coastal Zone Management**

In coastal areas, the NPPF requires local planning authorities to take account of the UK Marine Policy Statement and marine plans and apply integrated Coastal Zone Management to ensure the integration of and terrestrial and planning regimes. It further states that risks arising from coastal change should be reduced by avoiding inappropriate development in vulnerable areas or adding to impacts of physical changes to the coast. Areas likely to be affected by physical changes to the coast should be identified as Coastal Change Management Areas and policies applied as appropriate.

Marine planning, including the preparation of Marine Plans, will be carried out by the Marine Management Organisation (MMO). Marine Plans must be consistent with the Marine Policy Statement and they will make a significant contribution towards coastal integration. They will guide developers about where they are likely to be able to carry out activities or where restrictions may be placed on what they do.

The Thames Estuary falls within a proposed Marine Planning Zone but the Marine Management Organisation has not yet started work on a Marine Plan for this area. Until the implications of this work are fully understood, it is premature for the Council to preempt the outcome of the marine planning process. In the interim, the MMO is being consulted under the Duty to Co-operate. Policy CS12 on Green Infrastructure seeks to ensure that there is no net loss of biodiversity in the Borough and that opportunities to enhance it are sought which should ensure that the Council’s policies are compatible with Natural England’s proposed Thames Estuary Marine Conservation Zone. Also of relevance in this respect is the Environment Agency’s work on: the Greater Thames Coastal Habitat Management Plan; the Thames River Basin Management Plan; and the emerging TE2100 Plan.

**Policy CS18: Climate Change**

**Flood Risk**

With the exception of the previously developed sites along the Thames Riverside (see policies CS03, CS04 and CS05), development will be directed sequentially to those areas at least risk of flooding.

Proposals in areas at risk of flooding must be accompanied by a Flood Risk Assessment and, if required, a Flood Risk Management Plan to demonstrate that they are adequately defended and safe. Planning permission will be refused for schemes which do not pass the sequential and exception tests.

The Council will prioritise the maintenance, improvement or replacement of flood defence infrastructure over other land uses where relevant.

**Sustainable Drainage and Surface Water Run-Off**
The Council will seek to minimise the impact of drainage from new development on waste water systems. In particular, the Council will:

- Require that surface water run-off from all new development has no greater adverse impact than the existing use;
- Require the use of Sustainable Drainage Systems on all developments where technically and financially feasible;

Water Demand Management

The Council will seek to manage the supply of water in the Borough and reduce the impact of new development on the supply of potable water as much as possible. In particular, the Council will:

- Require all new homes to be built to at least level 3/4 of the Code for Sustainable Homes in terms of water use (105 litres per person per day consumption). Where it can be demonstrated that a development is unable to meet these standards, permission will only be granted if provision is made for compensatory water savings elsewhere in the Borough.
- Seek 5% of homes on key sites to act as exemplars by meeting level 5/6 of the Code for Sustainable Homes in terms of water use (80 litres per person per day consumption).
- Require all non-residential developments of 1,000 sq m and above to meet the BREEAM 'excellent' standards of water efficiency and include provision for the collection of rainwater.
- Support proposals to retrofit existing residential properties in ways which reduce water consumption

Carbon Reduction

The Council will seek to reduce the overall carbon footprint of the Borough. In particular, the Council will:

- Require proposals for development of the key sites to consider the potential and include proposals for low carbon and renewable energy generation, including combined heat and power. Applicants must submit evidence which demonstrates how the requirements have been met or which demonstrate that compliance is not technically or financially feasible
- Support stand-alone decentralised, renewable or low carbon energy development where it does not adversely affect the openness of the Green Belt and is consistent with AONB policy
- Support other proposals which lead to a reduction in carbon footprint including the retrofitting of existing homes

Development and Design Principles

Gravesham has a distinct and diverse character, with its unique heritage as a historic riverside town, surrounded by distinct rural settlements set in an attractive rural landscape, which is highly valued by residents and visitors alike. Over the plan period, the Council proposes to safeguard the Green Belt by meeting its development needs predominantly within the urban area. To deliver this strategy the Council will seek to achieve the most efficient use of land. This in turn will lead to increases in the density of
the built environment particularly in the urban area and the rural settlements inset from the Green Belt. The challenge is to ensure that new development is well designed so that it strengthens the character and distinctiveness of the area, safeguards local amenity and makes a positive contribution to the environment.

This policy gathers together the design requirements from a range of policies within the Core Strategy. Developers should refer to all relevant policies in the plan to inform their submission.

The Council will seek to manage new development in a way that makes a positive contribution to the built, historic and natural environment. Ensuring new development is attractive, fit for purpose, reinforces local character and safeguards people’s amenity is key to achieving successful neighbourhoods and gaining community acceptance of changes to their local area. However this does not mean that only traditional design solutions will be supported. The Council recognises the positive impact contemporary, innovative design solutions can have in appropriate locations, particularly where they embrace sustainability and enhance local distinctiveness.

General design principles underpinning good design are set out in national policy and other locally adopted documents including the Kent Design Guide (Supplementary Guidance) and the Kent Downs AONB Management Plan. For residential development, *Building for Life* is the national standard for residential design quality and encompasses good design objectives. These principles underpin Gravesham’s approach to design.

The Council recognises that different parts of the Borough present different contexts for new development and therefore require different design responses if they are to be successfully integrated into the surrounding area. To help understand the character of the Borough, a range of studies have been carried out which include a Landscape Character Assessment and Urban Baseline Study. Appraisals of most of the Borough’s Conservation Areas have been undertaken and a range of Management Plans produced to inform decisions and guide investment decisions in these areas. Furthermore, some communities, such as Meopham, have prepared their own Parish Plan and this includes a consideration of the settlement’s character.

In line with national policy, the Council recognises that safety and security are essential in creating successful places where people wish to live and work. In considering the design and layout of proposals, applicants will have regard to the principles contained in current guidance such as “Secured by Design”, “Crime Prevention through Environmental Design” and “Park Mark” (for car parks).

National policy recognises the contribution that a high quality public realm makes in creating successful places. Public art is a component of the public realm and can contribute to the creation of a strong sense of place and local distinctiveness in a scheme. It can take many forms from physical pieces to creative lighting, street furniture and street floorscape. The Council will expect applicants to consider opportunities to provide public art as an integral part of their approach to the public realm.

There is a strong case for seeking improvements in the overall sustainability of new development. The degree to which new development incorporates sustainable construction and makes efficient use of resources, including land, are important components of good design. In line with national policy, the Council will support new
development that uses land efficiently and incorporates innovative designs and measures to address the causes and effects of climate change, as set out in policy CS18 Climate Change.

In support of their proposals, applicants will submit Design and Access statements to explain the design principles that have informed the approach underlying the planning application and to demonstrate how they have taken account of the design criteria and guidance adopted by the Council and other relevant planning policies set out in the Core Strategy. Statements will also demonstrate how the design ensures that everyone, including disabled, older people and very young children, will be able to use the buildings and spaces being created and how crime prevention measures have been incorporated within the proposal. Current best practice guidance on Design and Access statements can be found in the Commission for the Built Environment (CABE) document “Design and Access Statements: How to write, read and use them”.

To support the delivery of well designed successful developments, the Council will encourage pre-application discussions with developers, particularly for major development proposals, sensitive development or proposals that affect a wide area. For larger and more complex proposals, developers may also be required to submit additional information to support their application such as a spatial masterplan, development brief, concept statement or design codes.

A proportionate amount of stakeholder and community engagement should also be undertaken to ensure that the design approach responds to expert advice and the needs and wishes of those who will use the places or buildings created. Developers will be encouraged to seek independent advice from the South East England Design Review Panel (currently provided through the Kent Architecture Centre), to inform their design approach, where proposals are likely to have a significant impact on the appearance and functioning of an area.

All new residential accommodation, including conversions, will normally be required to conform to the minimum space standards that will be set out in Supplementary Planning Guidance. The space within and around individual dwellings is an important factor in the quality and adaptability of accommodation, the well being of occupants and the impact of a proposed development on the character and amenity of the surrounding area. It is expected that the minimum floorspace standards will be exceeded to create good quality accommodation and to ensure future adaptability of the dwelling.

The Council will provide further guidance on these design principles in the Site Allocations and Development Management Policies DPD and through a Supplementary Planning Document.

**Policy CS19: Development and Design Principles**

New development will be visually attractive, fit for purpose and locally distinctive. It will reinforce the character of the local built, heritage and natural environment and integrate well with the surrounding local area. New development will also be adaptable, resilient to the effects of climate change and meet anti-crime standards. This will be achieved through the criteria set out below:
- The design, layout and form of new development will be derived from a robust analysis of local context and character and will make a positive contribution to the street scene, the quality of the public realm and the character of the area. Account will be taken of the scale, height, building lines, layout, materials and other characteristics of adjoining buildings and land. Account will also be taken of strategic views, heritage assets and natural features which contribute to local character and sense of place.

- New development will encourage sustainable living and choice through a mix of compatible uses which are well connected to places that people want to use, including the public transport network, local services and community facilities; encourage sustainable travel; enhance Green Grid links and encourage healthier lifestyles.

- New development will avoid causing harm to the amenity of neighbouring occupants, including loss of privacy, daylight and sunlight, and will avoid adverse environmental impacts in terms of noise, air, light and groundwater pollution and land contamination.

- New development will be designed in an inclusive way to be accessible to all members of the community.

- New development will provide appropriate levels of private and public amenity space.

- New development will include details of appropriate hard and soft landscaping, public art, street furniture, lighting and signage and shall ensure that public realm and open spaces are well planned, appropriately detailed and maintained so they endure.

- Car parking will be well related to the development it serves.

- New development will protect and, where opportunities arise, enhance biodiversity and the Borough’s Green Grid network. Support will be given to environmental enhancements where opportunities arise.

- New development will be fit for purpose and adaptable to allow changes to be made to meet the needs of users (residential or business).

- The design and layout of new development will take advantage of opportunities to build in resilience to the effects of climate change. This will include protection against flood risk, where relevant, delivering carbon reduction, provision for low carbon and renewable energy, and minimising energy consumption and water use.

- New development will incorporate appropriate facilities for the storage and recycling of waste.
• The layout of new development will create a safe and secure environment and provide surveillance to minimise opportunities for crime and vandalism.
Heritage and the Historic Environment

Our heritage is a valuable but fragile asset, so easily destroyed but so important in how we define or make sense of the world within which we live. Also, as our heritage comprises remnants of the past, such assets that have been passed down to us must be treated as a non-renewable resource. The principle of sustainable development therefore dictates that we should act as custodians of our heritage, meeting the Borough’s current needs and aspirations whilst enabling future generations to benefit from, interpret and enjoy this irreplaceable legacy. The richness and diversity of local heritage assets sets much of Gravesham apart from other areas and provides a strategic advantage upon which to build its future role and identity.

In addition to their cultural, architectural and historic importance these assets have the potential to act as a significant draw for inward investment and heritage led regeneration. This is both through the enhancement of their settings and a making a more interesting and attractive place to live, work and visit.

Of particular importance in defining the heritage interest of Gravesham are:-

- The historic town centre of Gravesend in its riverside setting, together with the borough’s urban conservation areas and their settings;
- The borough’s historic villages, many of which include conservation areas at their core, and their countryside settings; and
- The borough’s extensive maritime, military, industrial and transport history that is revealed in surviving built form and archaeological remains.

The Borough’s also benefits from having many literary connections with Charles Dickens and from the presence of historic Cobham Hall and its surrounding landscape.

National planning policy clearly establishes that conservation and enhancement of the historic environment should be afforded considerable importance within the planning process and that decisions should be made on the basis of an informed evaluation of the significance of designated and non-designated assets. The weight accorded the heritage interest in any decision will depend on the significance of the asset and the degree of harm caused to it or its setting compared to the public benefit that may derive from the development proposed. It also allows local authorities to consider the benefits of enabling development to secure the future conservation of a heritage asset.

The nature and form of heritage assets within the Borough are extremely diverse and extend beyond those which may be subject to statutory designation. Further information on the Borough’s heritage assets can be found in the Heritage and Character Baseline Report December 2009. Depending on their heritage significance, and the value placed upon them by the local and wider communities, these assets contribute toward what makes the Borough distinctive and how people relate to it.

The Borough’s key heritage assets include:

- Listed Buildings (approximately 450 in total) such as Gads Hill, Higham, the former home of Charles Dickens;
- Conservation Areas (24 in total) such as The Hill Northfleet;
- Scheduled Monuments (8 in total) such as Gravesend Blockhouse;
• Historic landscapes, landscape features, parks and gardens such as Cobham Park;
• Known archaeological sites and areas of archaeological significance; and
• A significant number of un-listed buildings and features of local historic and/or architectural value.

The Council has recently undertaken appraisals of some of its Conservation Areas and has developed a range of Management Plans to inform proposals and decisions and to guide investment in the built environment. In addition, the Council can produce lists of locally important buildings. Such buildings are not of national importance but still make a significant contribution to the character and quality of an area because of their local architectural or historic interest. Whilst the Council has maintained a list of locally important buildings for some years, it is intended that this will be updated and included in a Supplementary Planning Document (SPD) on heritage and the historic environment in due course. This work will set out and consult on clear criteria (including architectural, historic and townscape significance) and the process to be followed for identifying locally important buildings.

The Council will expect any proposals for development to demonstrate a thorough understanding of the heritage significance of any affected assets, their context and setting. Proposals should have regard to any relevant Conservation Area appraisals and associated Management Plans, lists of buildings of national and local architectural or heritage interest and guidance relating to areas of archaeological interest adopted by the Borough Council.

**Policy CS20: Heritage and the Historic Environment**

The Borough Council will accord a high priority towards the preservation, protection and enhancement of its heritage and historic environment as a non-renewable resource, central to the regeneration of the area and the reinforcement of sense of place. Particular attention in this regard will be focused on those heritage assets most at risk through neglect, decay or other threats. Securing viable, sustainable and appropriate futures for such assets at risk will need to be reconciled with the sensitivity to change that many present.

Proposals and initiatives will be supported which preserve and, where appropriate, enhance the significance and setting of the borough’s heritage assets, their interpretation and enjoyment, especially where these contribute to the distinct identity of the borough. These include:

• Gravesend Town Centre, its development as a heritage riverside town, and its setting;
• The borough’s urban and rural conservation areas; and
• Surviving built features and archaeology relating to the borough’s maritime, military, industrial and transport history.

When considering the impact of a proposed development on a designated heritage asset, the weight that will be given to the asset’s conservation value will be commensurate with the importance and significance of the asset. For non-
designated assets, decisions will have regard to the scale of any harm or loss and the significance of the heritage asset.